UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 2, 2015

REPLY TO THE ATTENTION OF:

LU-9J

Mr. Walter Galacki
SPX Corporation
13320 Ballantyne Corporate Place
Charlotte, North Carolina 28277-2706

Re: SPX Lindberg Facility
304 Hart Street, Watertown, WI 53094
Revised Self- Implementing PCB Clean-up Plan

Dear Mr. Galacki:

The U.S. Environmental Protection Agency has completed its review of the proposed Self-Implementation On-Site Clean up and Disposal of PCB Remediation Waste (Plan) report dated December 19, 2014 for the subject site in Wisconsin.

The report submitted by your Consultant, TRC of Milford, Connecticut seeks approval of the cleanup plan in accordance with the Environmental regulation 40 CFR761.61 (a) (3). The project involves the complete demolition of the facility including the concrete flooring and disposal of the material based on its characterization in accordance with EPA regulations.

August 2010

Background: In advance of a planned self-implementing cleanup, SPX had previously submitted a proposed plan to remediate PCB impacted areas only in accordance with 40 CFR 761.61 (c), based on characterization performed by Delta Consultants for SPX. This plan was approved by EPA by letter of March 28, 2011. Since then, SPX has reassessed the condition of the facility and decided that in its deteriorated state it is best to completely demolish the building and remediate the site.

The Plan calls for demolishing the building and removal of all the concrete flooring and manage it as PCB remediation waste in accordance with 40 CFR 761.61(a) (3), including possible reuse and disposal of the waste. This is to be based on verification sampling (including sub slab sampling) following the remediation. Once remediated, SPX proposes to record a Deed notice for use of the site as for commercial or industrial purposes only, consistent with EPA and WDNR regulations.

Decision: Based on the review of the Plan, **approval** to implement the plan is granted subject to the following conditions:

1) Within 60 days of the completion of the plan implementation, SPX must submit a Completion Report that includes results of the Verification sampling and details of the operation such as waste quantities and disposal sites.

2) Within 60 days of the completion, SPX will record, in accordance with the state law a Deed restriction pertaining to the future land use of the property consistent with the verification results and EPA/WDNR requirements. A draft of the Deed Notice shall be submitted to EPA for review prior to its official filing with the appropriate governmental body. A written certification indicating that the Deed restriction has been filed will need to be submitted to the EPA Regional Administrator.

3) At least 45 days before conveying in any manner, ownership or responsibility of the facility or underlying property SPX will notify EPA Region 5 of its intent to convey such ownership or responsibility. The notice will include the date of the intended conveyance, and the contact information of the new owner.

Please note that this acknowledgment does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. If you have any questions, please contact me by e-mail at nemani.nate@epa.gov or by telephone at (312) 886-3224.

Sincerely,

N. Nemani

Nate Nemani, P.E.
Corrective Action Project Manager
Remediation and Reuse Branch
Land and Chemicals Division.

cc: Michael R Schmoller, WDNR
David McNichol, TRC Consultants.

Writers Direct Dial: 704-808-3751
Writers Direct Fax: 704-752-4578
E-Mail Address: walter.galacki@spx.com

November 19, 2014

USEPA
Region 5
TSCA/PCB Coordinator
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: N. Nemani, L-8J

Re: SPX Corporation former Lindberg Facility
304 Hart Street
Watertown, WI 53094

Gentlemen:

As recently discussed between TRC, SPX's environmental consultant, and USEPA's Nathan Nemani, SPX is submitting this information to notify and certify to the Agency and all concerned (the EPA Regional Administrator, the Secretary of the WI DNR, Jefferson County, and the City of Watertown) that SPX intends to conduct a "self-implementing on-site cleanup and disposal of PCB remediation waste" for the captioned site.

SPX had previously received EPA's approval for a partial removal of PCB surficially contaminated concrete flooring and encapsulation of other flooring (40 CFR 761.61 (c)) dated 28 March 2011. As discussed, based on the deteriorating condition of the building and in consultation with the City, SPX has decided to demolish the building and all associated structures and completely remediate the facility in accord with 40 CFR 761.61 (a).

Enclosed is documentation covering the nature of the PCB contamination, the summary of procedures and methods for sampling, characterization and analysis, the location and extent of the contamination, and a cleanup plan including schedule, disposal plan and the demolition and remedial approach.

SPX CORPORATION
13320 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277-2705
UNITED STATES OF AMERICA

WWW.SPX.COM

Since we believed that we were close to an EPA approval several weeks ago, we are asking for an expedited review of this material in order that our demolition and remediation contractor may continue with his work at the site. Should you need any further information please contact our consultant, Dave McNichol of TRC immediately.

Thank you in advance for your attention to this matter.

Very truly yours,

Walter Galacki
Director Environmental
For SPX Corporation, Owner and Operator and Successor in Interest of the former SPX Lindberg site

W/enclosures

CC: Jefferson County Health Department, Environmental Health Section
WI DNR, Remediation and Redevelopment Program
City of Watertown, J.J. Holloway, PE
TRC, Dave McNichol
Nixon Peabody, Al Floro

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1.0 INTRODUCTION

1.1 PURPOSE

SPX Corporation (SPX) wishes to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste* at the SPX Lindberg facility located at 304 Hart Street, Watertown, WI 53094. The entire project also involves the complete demolition and remediation of the facility. SPX had received EPA's approval for a risk-based approach under 40 CFR 761.61(c). See EPA letter dated March 28, 2011.

SPX, however, no longer believes the facility is useful in its' deteriorated condition and now wishes to completely demolish the buildings and remediate the site and seeks, with the help of the City of Watertown, to find a redeveloper. Thus, SPX is seeking EPA's approval under 40 CFR 761.61(a) in order to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

1.2 BACKGROUND

Delta Consultants, Shoreview, MN has investigated the Lindberg facility for PCBs and has reported on those investigations. EPA's prior approval was based upon that reporting. TRC has been engaged by SPX to manage/oversee the remediation and demolition. As such TRC and SPX are continuing to rely upon Delta's earlier work and their report "Risk-Based Remediation Plan for PCB-Contaminated Concrete" dated August 2, 2010 and (the subsequent modifications and revisions) it is incorporated herein. For the reader's convenience and reference the material follows this report.

The PCB contamination observed at the former Lindberg facility is believed to have been from the manufacture of electrical transformers during a period from 1953 until 1971. No spill event nor history has been identified through a historical review as well as interviews with former employees. The primary PCB contamination is of concrete flooring (within the building) and to a lesser extent a small area outside the building which is a small loading/shipping pad and adjacent soils. Notably, the PCB contamination is not at depth in the concrete flooring, thus PCB contamination is not expected in the substrate beneath any flooring. See especially the Figures in the Delta Report.

SPX, in conjunction with the facilities full demolition and remediation, will remove all Asbestos Containing Building Materials (ACM), Universal Waste (batteries, lamps-both florescent and metal-halide, mercury in electrical components, CPUs, etc.), decommission all firewater, electrical, water and sewer, remove all oils, lubes, etc. For the demolition all C & D waste will be disposed at the local Subtitle D landfill operated by Waste Management and located in Watertown. The ACM is to be transported and disposed at the Pheasant Run Landfill operated by Waste Management and located in Bristol, WI. Universal waste is destined for Mercury Waste Solutions in Union Grove, WI. And, the PCB concrete along with a minor amount of soil (loading pad area) would be manifested and transported to a Subtitle C Landfill operated by Heritage Environmental Services located in Roachdale, IN.

2.0 NATURE OF PCB CONTAMINATION

The nature of the contamination is fully described and explained by Delta in their report. The sampling, the analysis, the PCB results and the graphic (figures) pattern of PCB contamination is all contained in section 2 of their report. SPX and TRC are relying on this information for the Cleanup discussion which follows in section 3. Please see section 2 of the Delta report for a description of the nature of the contamination.

3.0 CLEAN UP PLAN

The SPX former Lindberg facility had been principally a manufacturer of industrial ovens, furnaces, and environmental test chambers with an associated office activity. Early in its history the facility had also produced electrical transformers. The manufacturing areas were in some cases added buildings and in other cases large rooms or other functional areas within a given building-see figures. SPX will perform a self-implementing clean up resulting in PCB concentrations for the bulk PCB remediation waste of less than 1 mg/kg and unlimited use for the remaining land after all remediation and demolition are completed (40 CFR 761.61(a)(4)(i)(A). The proposed clean up includes the removal of PCB contaminated concrete, the removal of a minor quantity of PCB contaminated soils and a loading pad (only outdoor area), and the transportation and disposal of these materials to a RCRA Subtitle C facility all as more fully described below.

3.1 Bulk PCB Remediation Waste Removal and Disposal

SPX intends to remove all of the concrete flooring shown on Figure 1. The contractor hired by SPX, Apollo Dismantling, has mobilized to the site and is currently preparing for the demolition and remediation. At the moment Apollo and its subcontractors are removing all ACM, removing all Universal wastes, collecting all lamps and ballasts, and draining and arranging for utility shutoff and blocks. Once this work is completed Apollo had planned to cut out and remove all PCB concrete for Title C Landfill disposal. See schedule below.

SPX proposes to remove all of the PCB contaminated flooring proposed in the previous approval (all of the areas which were to be removed and all the areas which were to be encapsulated). See relevant parts of Delta section 3. The removal will be in all cases to full floor depth. In addition, SPX proposes to go beyond the limits previously estimated as the 10 mg/kg line by Delta; namely to the next core location (still locatable) where a measured result is less than 10 mg/kg. Thus existing measured values and full depth floor removal ensures the objective is met.

Remaining flooring will then be removed from all areas (rooms and/or buildings) where a PCB floor removal has occurred. The material will be sized and placed in a single on site pile for further use on site, if possible. Prior to any on-site use the pile will be sampled and analyzed to ensure that the material is less than 1 mg/kg PCB. If less than 1 mg/kg PCB, it is candidate material for onsite use to fill any basement voids from the demolition. Should the pile material test between 10 and 1 mg/kg it will <u>not</u> be used onsite but will be disposed into a Subtitle D landfill, either for temporary cover or as fill. Thus any PCB concrete greater than 10 mg/kg (and minor soils quantity) will be disposed at a Subtitle C facility; any PCB concrete between 10 and 1 mg/kg will be disposed in a Subtitle D landfill facility; and,

any PCB concrete less than 1 mg/kg may be retained for use to fill basement voids onsite-or if an excessive quantity exists may also be disposed in a Subtitle D landfill facility.

3.2 SCHEDULE

The proposed schedule is as follows:

ACM removal 24 Oct-26 Nov
PCB bulk removal 8 Dec-15 Jan
Lights/ballasts/U waste 17 Nov-15 Dec
Demolition 8 Dec-15 Feb
Restoration Spring 2015

3.3 Verification

Verification sampling is necessary for two areas. The removal of the concrete pad in the rail car loading/unloading area (including soils) and the concrete removed pile which will be less than 10 mg/kg and likely less than 1 mg/kg. In both cases EPA Method 8082 will be used for sample analysis. The outdoor excavation will be sampled with 2-sidewalls samples and a bottom invert sample. The concrete pile will be sampled with 6 samples, composited to 2 for analysis.

Since there was no indication in any of the Delta investigation (more than 585 concrete cores) of PCB at floor depth, it is not necessary to sample any substrate below the flooring.

3.4 Site Restoration

After completion of all the demolition and remediation activities the site will be restored. The front side walk on Hart Street will remain. The voids of former basement areas will be filled with the concrete from the less than 1 mg/kg pile (assuming it has been verified as above described). After the voids are filled fresh stone will be imported to cover the concrete areas. This will be somewhat crowned to allow that no ponding should occur over time. The property will then be idle until redevelopment can be planned and implemented.

4.0 RECORDKEEPING

A file containing all sampling, analysis, results, graphic depictions of results, shipping and manifesting documents including weight tickets and summaries will be created. Several electronic copies of the record compilation will be made. An electronic copy will be forwarded to USEPA Region 5 PCB Coordinator and to WI DNR PCB Section.

Since it is a cleanup to less than 1 mg/kg PCB no further actions are anticipated.

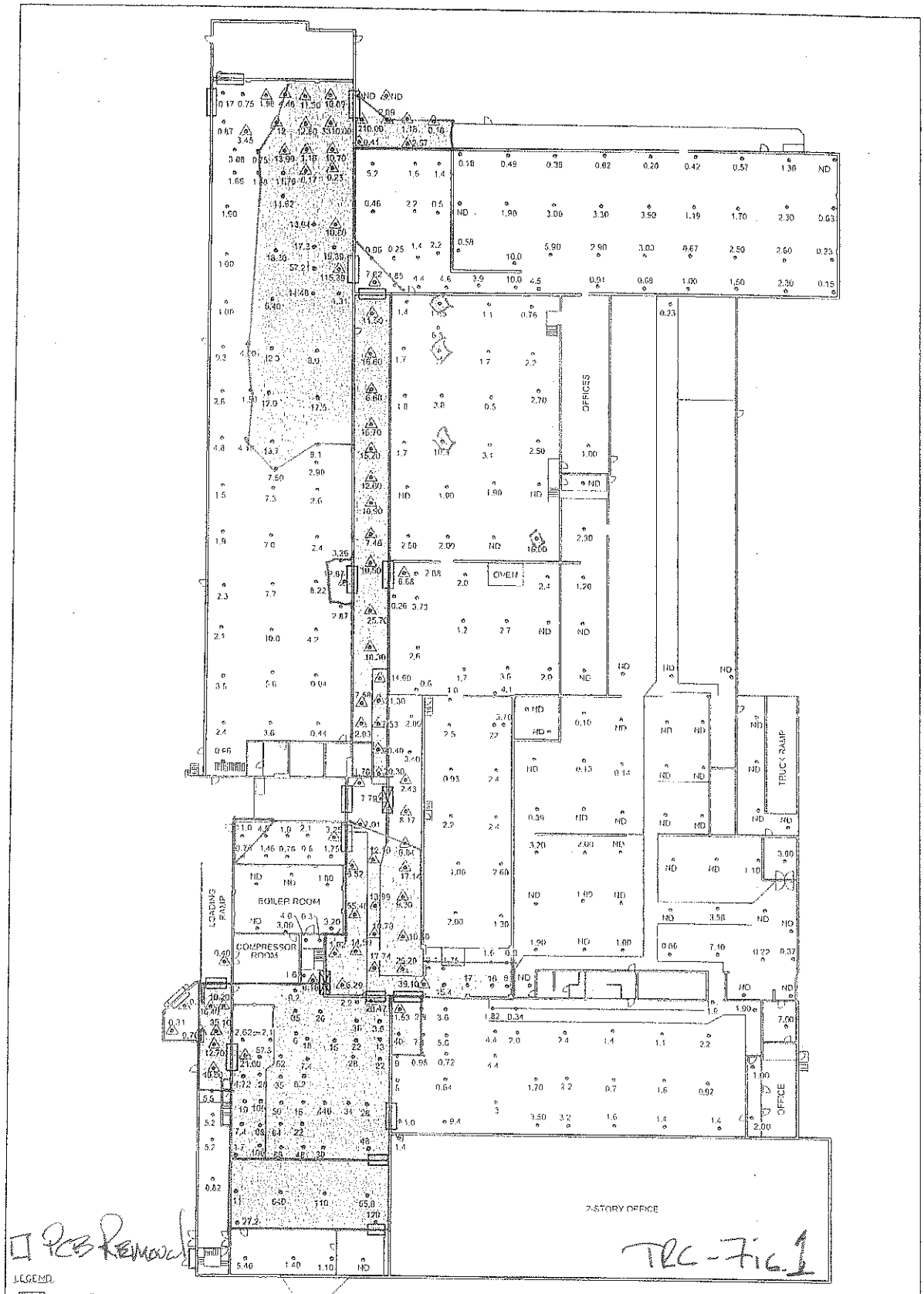

FIGURE 6
PROPOSED AREAL EXTENT OF REMEDIATION
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

PROJECT NO.	PREPARED BY	DRAWN BY
9M09092A5	HT	DD
DATE	REVIEWED BY	FILE NAME
6/1/10		Watertown-6

DELTA

Waste Management Plan
November 2014

SPX - Lindberg
304 Hart Street
Watertown, WI 53094

Prepared for:

SPX
13320 Ballantyne Corporate Place
Charlotte, NC 28277

Prepared by:

APOLLO DISMANTLING
4511 Hyde Park Blvd.
2nd Floor
Niagara Falls, NY 14305

Waste Management Program

1.0 Introduction

The objective of the ***Apollo Dismantling Waste Management Plan*** is to characterize, manage, containerize, transport and dispose of all regulated, hazardous, non-hazardous, and recyclable waste streams during the remediation and demolition activities associated with the 170,000 sq. ft. SPX industrial complex located at 304 Hard Street, Watertown, Wisconsin 53094.

Apollo will perform all work in accordance with the applicable regulations and standard industry practice. In addition, Apollo will conduct a general assessment of the conditions and materials associated with the facility. It is anticipated that the *Waste Management Plan* will be revised as the project progresses to ensure all waste materials are identified and project activities are consistent with waste characterization reports and the applicable regulatory requirements.

1.1 Asbestos Abatement Phase

The asbestos abatement phase includes the removal of all previously identified asbestos materials and any additional identified asbestos containing building components. The friable asbestos is pipe insulation and it is located throughout the facility. The non-friable asbestos abatement includes the removal of transite panels on the exterior walls and flooring materials located in various areas. In addition, any other suspect building components (roofing, flashing, window caulk, etccc) will be tested for asbestos in accordance with the applicable regulations. All of the asbestos containing building materials will be identified, quantified, package and disposed of in accordance with the applicable federal, state and local regulations.

1.2 Debris Removal and C&D Waste

The debris clean-up phase includes the removal of all garbage, paper, cardboard, desk, rugs, partitions, wood and other general debris found within and around the exterior of the facility. This debris and other non-regulated construction and demolition waste generated during the demolition work will be placed in dumpsters or loaded into dump trailers and disposed of in accordance with the applicable regulations.

1.3 PCB Concrete-RECRA

A PCB assessment report completed by Delta Engineers was completed in August 2010. This report outlines the areas of contaminate PCB concrete that will be handled as RECRA Waste. The majority of the RECRA waste will be removed prior to mass demolition and staged for loading. The building area (approx..7,000 SF) which contains a basement below the PCB contaminated concrete 1st floor slab will be performed after the above grade building structure has been demolished.

1.4 PCB Concrete – NON-RECRA, Masonry, Concrete Slabs and Foundations

Apollo will demolish, remove, downsize (12" minus), and stockpile on-site Clean Concrete Slabs and Foundations, NON-RECRA PCB Concrete Slabs, and Masonry debris. Apollo and SPX will determine the final location of stockpile/berms.

1.5 Universal Waste

An inventory of Universal Waste was provided in the bid documents. In addition, Apollo will inspect the facility to confirm **all** universal waste items are identified and collected. If necessary, Apollo will request additional sampling and analysis to be performed to characterize each waste stream as it is collected, identified and packaged. Based on the results of this characterization, and analytical results, Apollo will transport and dispose of materials in the appropriate manner as per the applicable federal, state and local regulations.

2.0 Disposal Facilities

Waste recycling/disposal facilities were selected based on several factors including waste types, facility acceptance criteria, regulatory compliance history and price.

Waste Stream and Disposal Facility

- ***C&D Waste***
  Waste Management
  Deer Track Park Landfill
  N6756 Waldmann Ln
  Watertown, Wisconsin 53094
  (920)699-3475

- ***Universal Wastes***
  Waste Management
  Mercury Waste Solutions
  21211 Durand Ave
  Union Grove Wisconsin 53182
  (262) 878-2599

- ***Steel Scrap***
  LOEB-LORMAN
  1111 South Tenth Street
  Watertown Wisconsin 53094
  (920)390-2260

- ***Asbestos Waste***
  Waste Management
  Pheasant Run Landfill
  19414 60th Street
  Bristol, WI 53104
  (262) 857-7956

- ***PCB Concrete – RECRA***
  Heritage Environmental Services
  4370 West County Road 1275 N
  Roachdale, Indiana 46172
  (765) 435-2704

3.0 Documentation

All applicable local, state and federal documentation and record keeping requirements/guidelines will be followed. Apollo will provide the following:

- Waste Characterization Reports
- Waste Manifest and or Shipping Receipt

The above documents will identify the date the waste is removed from the site, transporter/hauler, waste disposal facility and their applicable state and or federal identification numbers.

RISK-BASED REMEDIATION PLAN FOR PCB-CONTAMINATED CONCRETE

SPX LINDBERG FACILITY

304 HART STREET

WATERTOWN, WISCONSIN

DELTA PROJECT NO. 9M0909245

Prepared for:

SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, North Carolina 28277
(704) 752-4430

Prepared by:

Delta Consultants
5910 Rice Creek Parkway, Suite 100
Shoreview, Minnesota 55126
(651) 639-9449

December 6, 2010

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SPX

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Writers Direct Fax: 704-752-4578
E-Mail Address: walter.galecki@spx.com

October 22, 2014

USEPA
Region 5
TSCA/PCB Section
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: N. Nemani, L-8J

Re: SPX Lindberg Facility
304 Hart Street
Watertown, WI 53094

Gentlemen;

As recently discussed between TRC, SPX's environmental consultant, and USEPA's Nathan Nemani, SPX Corporation has had a change in plans and now intends to completely demolish and remediate the named facility. SPX received EPA approval (March 28, 2011) for a partial removal of PCB contaminated flooring along with cleaning and encapsulating other PCB impacted floor areas. Based on the deteriorating condition of the building and a request from the City for building evaluation, SPX is requesting EPA's modified/amended approval for a complete removal of all flooring with PCB contaminant concentrations greater than 10 mg/kg. SPX believes that a complete removal of the PCB impacted areas above10 mg/kg and complete demolition of the facility represents a permanent remedy for the facility and is therefore a better and more complete remedial approach.

SPX proposes to remove all of the PCB contaminated flooring proposed in the previous approval and a small additional portion. As discussed, SPX is relying upon the work performed by Delta Consultants, "PCB Assessment Report" dated August 11, 2010; in particular Figures 6 and 7 from that and related reports which were previously submitted to EPA and are attached for reference. Rather than estimate a 10 mg/kg line (as the shaded areas on the Figures have done), SPX is

SPX CORPORATION
13320 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277-2706
UNITED STATES OF AMERICA

WWW.SPX.COM

proposing to have its' contractor remove the flooring to the next measured core where there has been a below 10 mg/kg measurement. Since there has been no use of the building in the intervening time, the bright white core patches are easy to locate. Please see the marked Figures 6 and 7 attached. SPX believes this increased floor removal will provide more certainty that removal has occurred to less than 10 mg/kg. Also, such an approach will reduce the need for confirmation sampling after concrete removal.

SPX believes this is the most prudent and practical approach because most of the remainder of the shaded floor areas are bounded by walls providing a practical limit for removal. The small area outside the rail/truck loading pad (see No. 2) will be subject to a removal until confirmed by post-excavation samples.

At this time SPX is considering removal and disposal of the impacted concrete at either the Heritage or U S Ecology facilities. No shipment would occur until and unless EPA has been notified and approval secured.

Since SPX has recently funded this work, received local approval from the City, and hired a contractor, your earliest response would be most appreciated. Short term work while we await your response will include asbestos related removal and demolition related preparation activities. SPX wishes to thank you for your consideration and review. Please call me directly or Dave McNichol of TRC (office: 203-876-1453, cell: 203-856-8388) if you have any questions.

Very truly yours,

Walter Galacki
Director, Environmental

cc: D. McNichol -TRC
S. DeFranks – Apollo

Enclosure

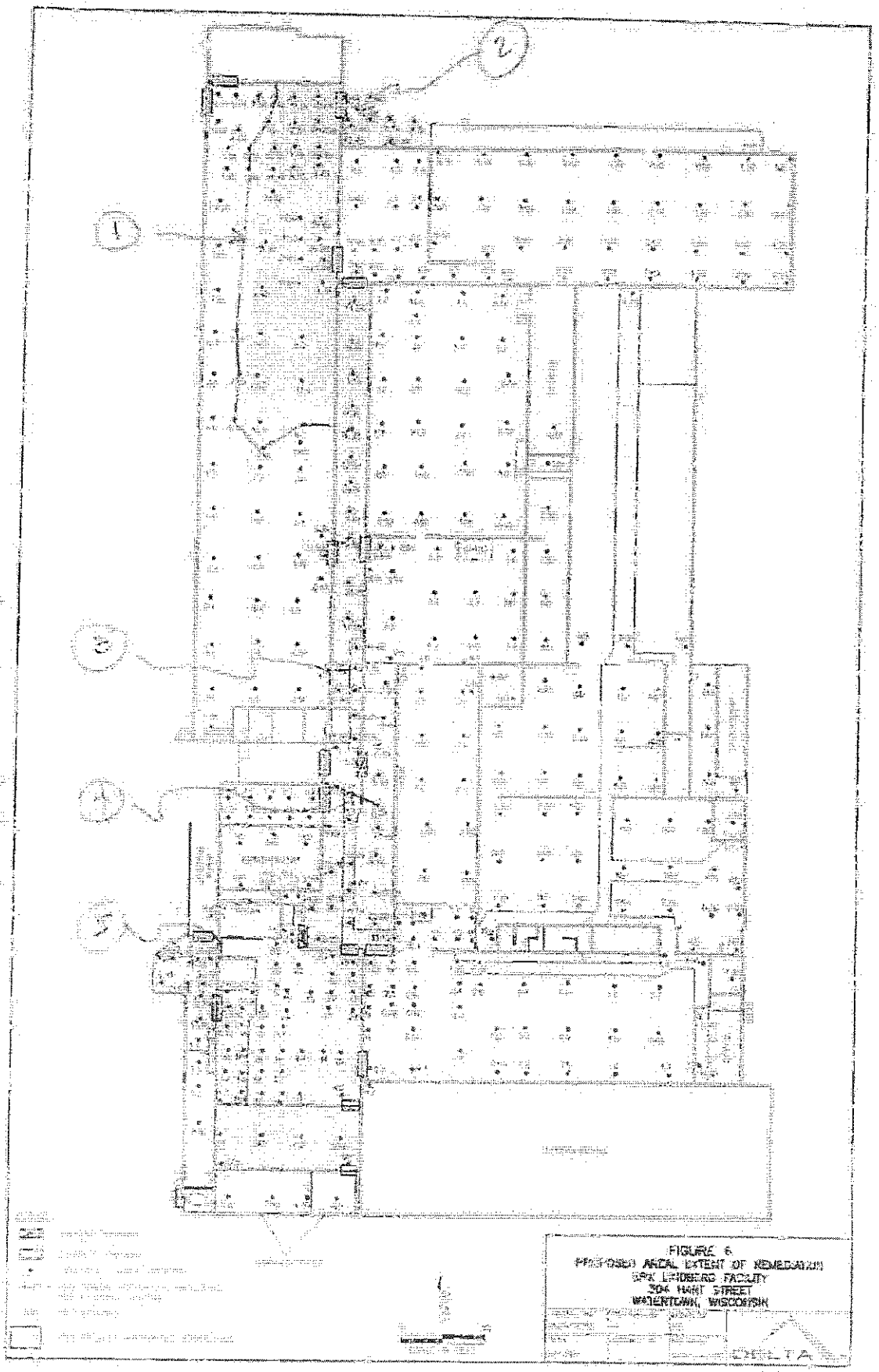
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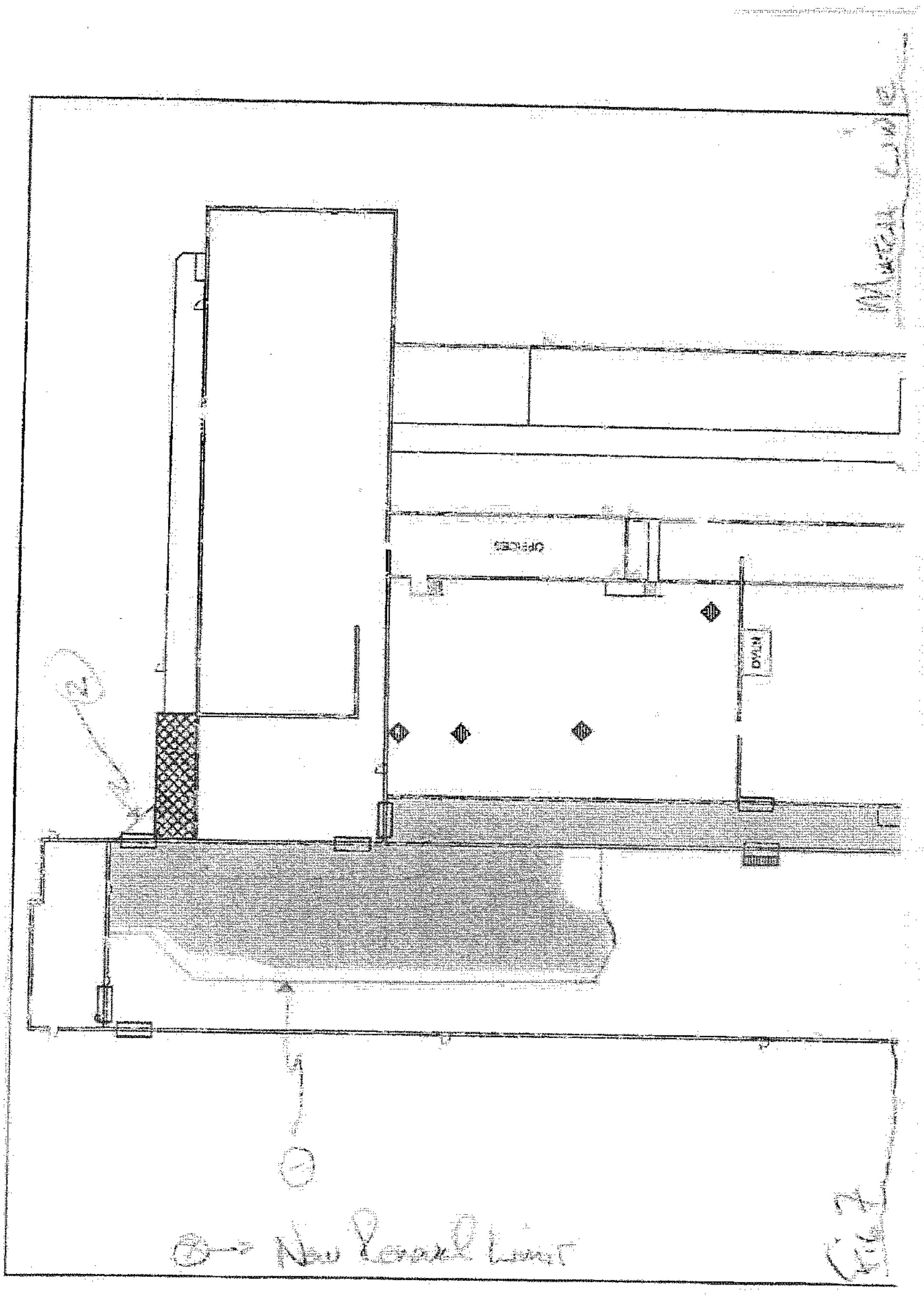
FIGURE 6
PROPOSED AREAL EXTENT OF REMEDIATION
SPX LYNDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA


OFFICES
DYNO
New Parcel Line

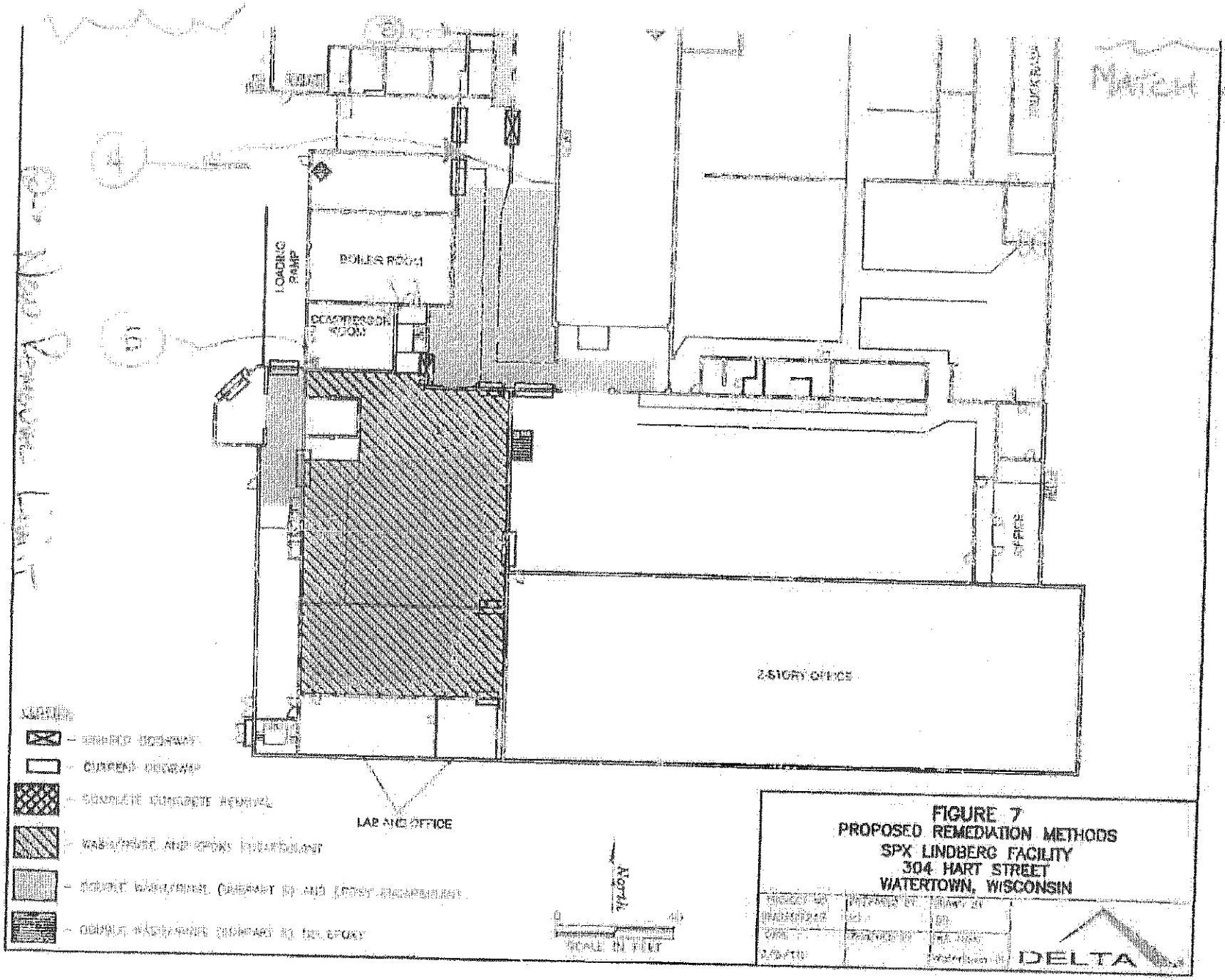


FIGURE 7
PROPOSED REMEDIATION METHODS
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

SPX

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E-Mail Address: walter.galacki@spx.com

October 22, 2014

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UNITED STATES OF AMERICA

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Very truly yours,

Walter Galacki
Director, Environmental

cc: D. McNichol -TRC
S. DeFranks – Apollo

Enclosure

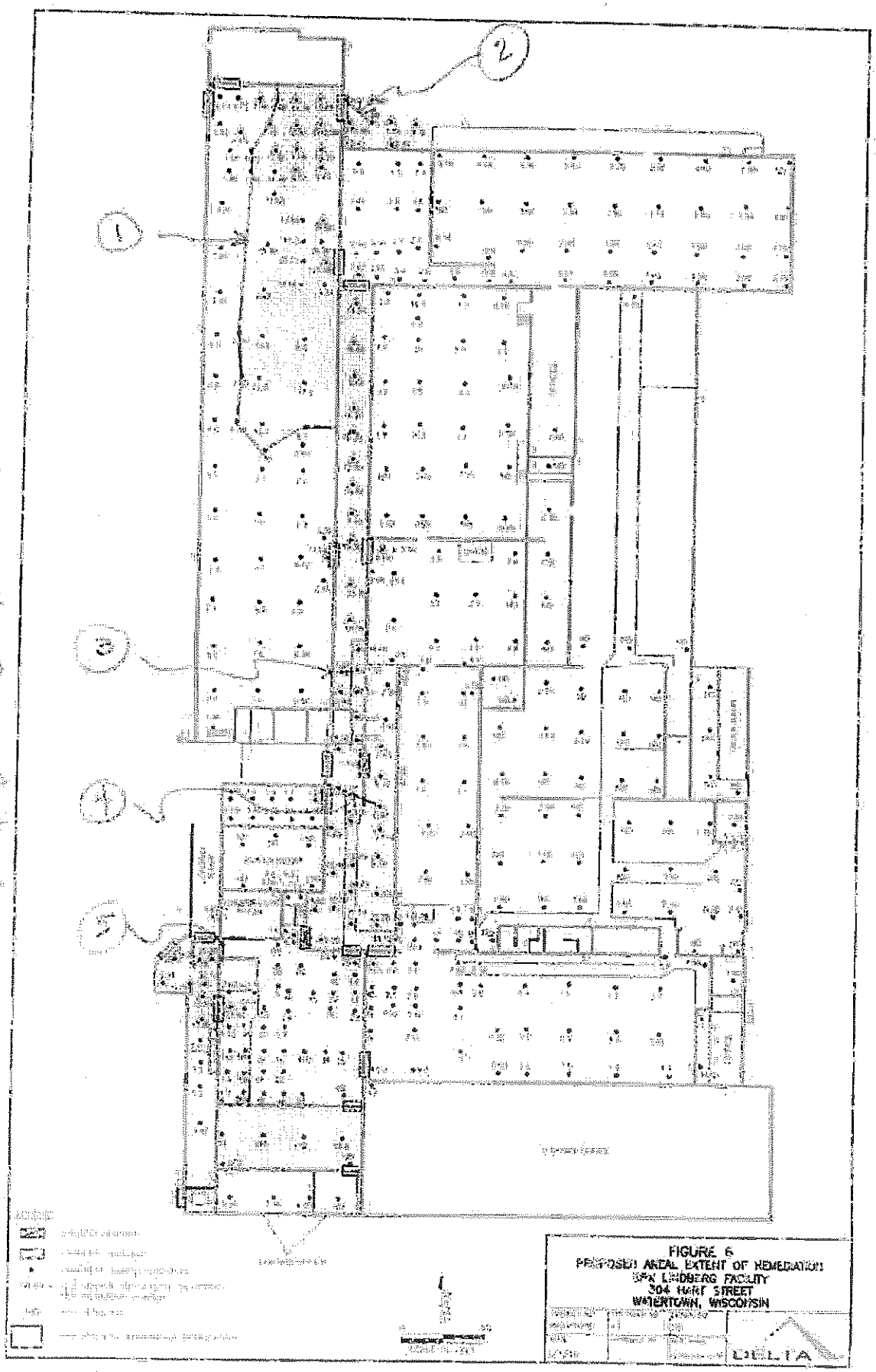
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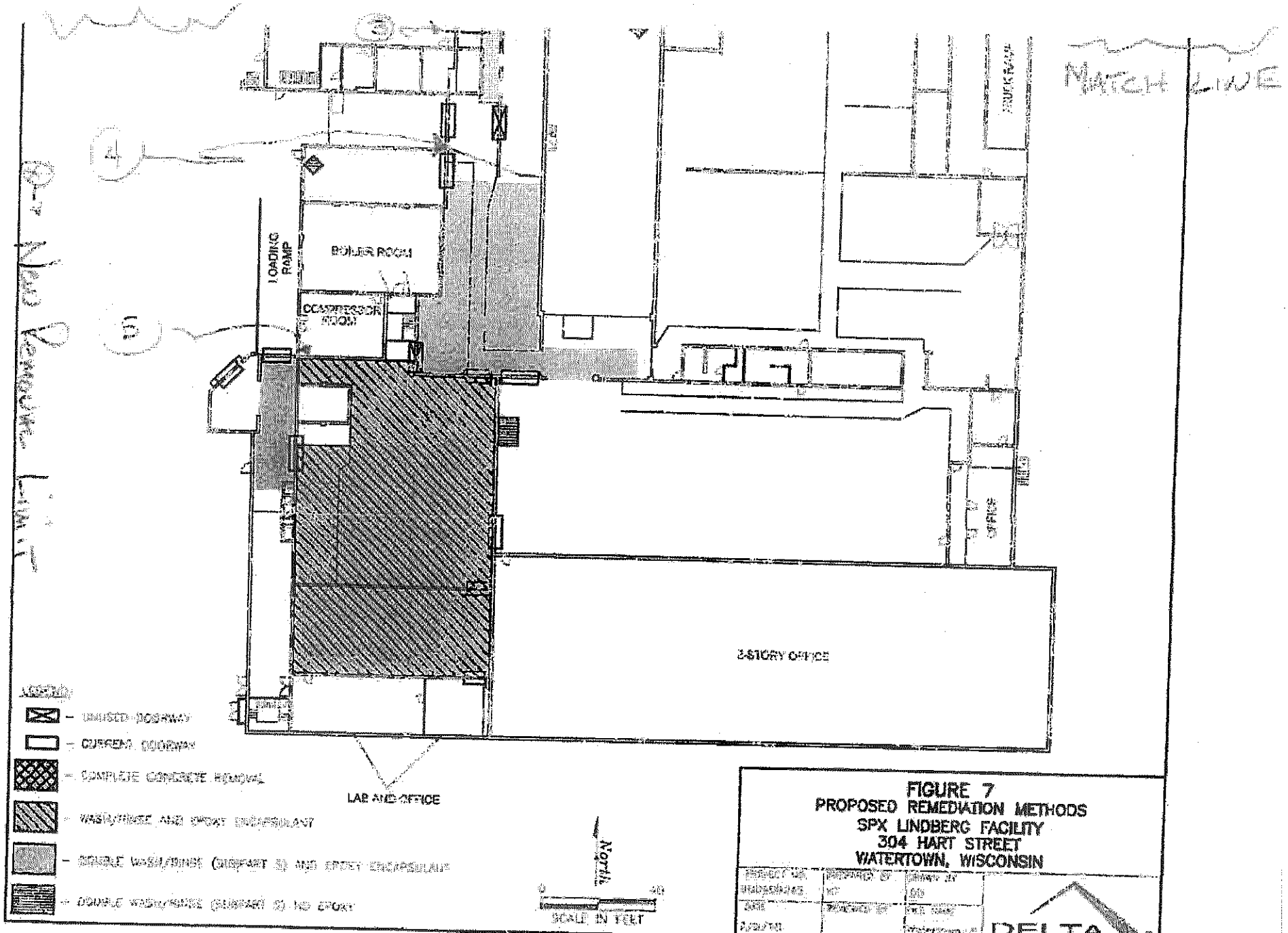
FIGURE 6
PROPOSED AREAL EXTENT OF REMEDIATION
SPX LINDBERG FACILITY
304 HUNT STREET
WATERTOWN, WISCONSIN
DELTA

OFFICES
OVEN
New Leased Limit


MATCH LINE
BOILER ROOM
LOADING RAMP
COMPRESSOR ROOM
OFFICE
3-STORY OFFICE
LAB AND OFFICE
- UNUSED DOORWAY
- CURRENT DOORWAY
- COMPLETE CONCRETE REMOVAL
- WASH/RINSE AND EPOXY ENCAPSULANT
- DOUBLE WASH/RINSE (SUBPART S) AND EPOXY ENCAPSULANT
- DOUBLE WASH/RINSE (SUBPART S) NO EPOXY
North
SCALE IN FEET
FIGURE 7
PROPOSED REMEDIATION METHODS
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA

Nemani, Nate

From: Galacki, Walter <walter.galacki@spx.com>
Sent: Wednesday, October 22, 2014 9:58 AM
To: Nemani, Nate
Cc: dmcnichol@trcsolutions.com; Baker, Susan; sam@apollodismantle.com
Subject: FW: Watertown EPA PCB letter
Attachments: USEPA Ltr dtd 102214 - Lindberg Facility, Watertown, WI.pdf

Hello Nate, I have not had a chance yet to speak with you regarding SPX's TPH Lindberg, Watertown Wi site, but in view of the time sensitivity and your recent discussion with our consultant, Dave McNichol of TRC, I wanted to formalize our requested PCB remediation approval change request (attached). I am over-nighting a hard copy of the letter and attachments. If you by chance have the time to review or see any need for immediate changes to our letter that would help expedite the Agency's review – please call me. We are trying to get certain aspects of the demo worked out and secured before winter sets in, and as such, your timely review would be most appreciated.

Thank you,

Walter Galacki
Director, Environmental

SPX Corporation
13320 Ballantyne Corporate Place
Charlotte, NC 28277
Tel: (704-808-3751
Cell: (704) 724-1743
Fax: (704) 752-4578
e-Mail: walter.galacki@spx.com

Nemani, Nate

From: McNichol, David <DMcNichol@trcsolutions.com>
Sent: Tuesday, October 14, 2014 7:38 AM
To: Nemani, Nate
Cc: Galacki, Walter; sam@apollodismantle.com
Subject: SPX Corp. Former Lindberg Facility, 304 Hart St., Watertown, WI

Categories: Red Category

Dear Mr. Nemani:

This email, on behalf of SPX Corporation, is to confirm our conversations of last week regarding the captioned facility.

SPX Corp. has had a change in plans and now wishes to completely demolish and remediate the facility rather than the previous plan (and EPA approval) to clean the contaminated PCB floor areas and effectively encapsulate the cleaned areas. We believe that this complete removal and complete demolition represents a permanent remedy for the facility and is therefore better.

We would propose to remove the PCB contaminated floor areas to the identical areal extent (with one exception) that the previously approved remedy proposed. The very same information that was submitted to EPA for that approval would again be relied upon. The removal would occur in the shaded areas shown on Drawing "Figure 7" from the "PCB Assessment Report" dated August 11, 2010 by Delta Consultants. Thus areas with a PCB concentration greater than 10 mg/kg will be removed and properly transported and disposed.

The exception involves the large building segment in the NW, in that area we propose to remove the floor beyond what the data show. Rather than estimate the 10 mg/kg line between cores we will remove to the less than 10 mg/kg core adjacent and beyond the shaded area. That way we believe we are being more conservative and complete, not having to rely so much on any post removal samples. We believe this further makes sense because most of the remainder of the shaded floor areas are bounded by walls-thus providing a practical limit for concrete floor removal. The small outside area will have a removal of the truck pad and soils which will need to be confirmed by post-ex. samples.

SPX has recently funded this work and hired a contractor, thus this request is very timely and we would hope for a reasonably timely response. We thank you for your consideration and review and would readily answer any questions.

Very truly yours,

Dave McNichol
Senior Consultant

TRC
Powering your confidence

500 Bic Drive, Ste. 103, Milford, CT 06461
T: 203.876.1453 | F: 203.876.1486 | C: 203.856.8388

dmcnichol@trcsolutions.com

Revisions to Risk-Based Remediation Plan, Section 3

Karen Thole to: Nate Nemani 12/06/2010 02:18 PM

Cc: Virginia.Sunde, dan.mcgrade

3 attachments

PCB Remediation Plan REVISED SECTION 3.pdf Fig4_SPX Watertown_PCB Results_0-1 Inch.pdf

Fig7_Proposed Remediation Methods.pdf

Nate,

Thank you for meeting with us during the November 29, 2010 telephone conference to discuss the Risk-Based Remediation Plan for the SPX Lindberg facility in Watertown, Wisconsin. I have attached Section 3 of the report, which has been revised to reflect the results of our meeting. I have also attached revised Figures 4 and 7.

Please let me know if you have any additional questions or comments. We look forward to receiving your approval of the plan in January 2011.

Karen J. Thole, P.G.
Project Hydrogeologist

Delta Consultants
5910 Rice Creek Parkway, Suite 100
Shoreview, MN 55126

(651) 697-5203 - direct dial
(800) 477-7411 - toll free
(651) 639-9473 - fax

kthole@deltaenv.com

3.0 CLEANUP PLAN

The SPX Lindberg facility is a manufacturing and office building. PCB-contaminated concrete is present throughout the manufacturing portion of the facility. Should a self-implementing cleanup be conducted, a cleanup level for bulk PCB remediation waste of ≤1 mg/kg would be required without further conditions per 40 CFR 761.61(a)(4)(i)(A). However, an alternative, risk-based cleanup level may be used, pending EPA approval, in accordance with 40 CFR 761.61(c). Based on preliminary conversations with personnel from EPA Region 5 and the Wisconsin Department of Natural Resources (WDNR), a risk-based cleanup level of ≤10 mg/kg PCBs may be an acceptable site-specific cleanup level for this facility.

A quantitative human health or environmental risk assessment has not been conducted. With the exception of the concrete pad in the rail spur loading area, the PCB contamination is located within the confines of the facility building. Vertical bulk concrete sampling results demonstrate that the PCBs have not penetrated the concrete floor to the underlying soil. Since the contaminated areas which will remain at the property following the proposed cleanup are confined within the physical enclosure of the building, no associated risks to the environment are anticipated. Access to the contaminated areas is provided by entrance doors which are currently locked. Under potential future use conditions, the anticipated use of the building is industrial. The potential occupational exposure in this scenario stems primarily from dermal contact with the contaminated floor.

what about human (future workers)

The proposed site cleanup presented below includes off-site disposal, engineered controls, and a deed restriction to limit exposure. Based on its industrial use and limited accessibility, a risk-based cleanup level of ≤10 mg/kg is being requested for this facility. Approximately 20,650 square feet of concrete contains PCBs at concentrations greater than 10 mg/kg (**Figure 6**).

The following remediation methods are proposed for the facility in order to address the PCBs at concentrations greater than 10 mg/kg:

- Bulk PCB Remediation Waste removal and off-site disposal of the 700 square-foot concrete pad in the rail spur loading area.
- Continued Use Authorization, which includes cleaning per Subpart S and two coats of epoxy, for the in-place management of 12,150 square feet of PCB-contaminated, bare concrete flooring.

> 10 mg/100 cm²

- Continued Use Authorization, which includes superficial cleaning and two coats of epoxy, for the in-place management of 7,000 square feet of PCB-contaminated, epoxy-coated concrete flooring.

- Bulk PCB Remediation Waste removal and off-site disposal of approximately 800 square-feet of PCB-contaminated concrete flooring located at 8 non-contiguous locations.

The locations within the facility proposed to be cleaned by these remediation methods are shown in **Figure 7**.

3.1 Bulk PCB Remediation Waste Removal and Disposal

A 16-foot by 43-foot concrete pad located in the in the rail spur loading area to the north the facility building was found to contain PCBs at concentrations greater than 10 mg/kg (**Figure 7; Appendix A, Photograph 1**). A bulk concrete sample collected from Concrete 36 contained 201 mg/kg PCBs in the 0 to 1 inch sample interval. In order to manage the PCBs in this area, SPX will remove the entire concrete pad in accordance with 40 CFR 761.61(a)(5)(i). The bulk PCB remediation wastes will be managed and disposed off-site in a TSCA-permitted landfill according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(2).

Following removal of the concrete pad, a confirmation sample will be collected from the soil beneath the location of Concrete 36. This sample will be analyzed for PCBs by EPA Method 8082. A bulk concrete sample previously collected from Concrete 36 contained 2.29 mg/kg PCBs in the 1 to 3 inch sample interval. Bulk concrete samples collected from the other five locations in the concrete pad did not detect the presence of PCBs at a depth of 1 to 3 inches, so no additional confirmation sampling will be performed beneath the concrete pad. Should the soil sample contain PCBs at a concentration of ≤1 mg/kg, the cleanup will be considered complete. If the soil sample contains >1 mg/kg PCBs, additional soil sampling would be conducted and soils containing >1 mg/kg PCBs would be removed and disposed off-site along with the concrete pad.

3.2 Continued Use Authorization

The 40 CFR 761.30(p) *continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* authorization will be implemented for the in-place management of 19,150 square feet of PCB-contaminated concrete located within the

facility. The proposed cleanup level for the work described in this section is ≤10 mg/kg PCBs.

The proposed cleanup area has been subdivided into two distinct areas with respect to the surface condition of the concrete. The first area consists of 12,150 square feet of bare concrete flooring stretching from the north end of the facility to approximately 440 feet to the south, including the loading dock located on the west side of the building (**Figure 7; Appendix A, Photographs 2 through 5 and 8**). The second area consists of a 7,000-square foot former assembly area near the southern end of the facility (**Figure 7; Appendix A, Photographs 6 and 7**). The floor in this area is covered with a white epoxy coating.

3.2.1 PCB Source Control

The first step of implementing the 761.30(p) continued use authorization requires the removal of the source causing the release of PCBs. No PCB releases have been reported or are known to have occurred within the facility. The results of the investigation discussed above do not indicate a point source of the PCB contamination. The results of a Phase I Environmental Site Assessment (EA) performed at the facility indicated the potential historical presence of PCBs related to the former manufacture of electrical transformers at the facility. According to information presented in the EA report, dated September 23, 2009:

> *The second suspect REC consists of the former manufacture of electric transformers at the Subject Property by the Hevi-Duty Company in the 1950's. Historically, manufacturers of transformers were known to employ dielectric fluids containing polychlorinated biphenyls (PCBs). This condition is characterized as a suspect REC since no direct evidence in the form of spills or releases of transformer fluids are known, nor have any indications of the use of PCB-containing fluids been directly identified at the Subject Property. However, the manufacturing of electric transformers at the Subject Property is indicated in a 1956 Sanborn map and the Hevi-Duty Company is known to have historically used PCB containing transformer fluids at other facility locations in the United States.*

Information regarding Hevi-Duty Company historical operations was obtained from the SolaHD website (http://www.solaheviduty.com). According to the company's historical summary, the combined operations of transformer and furnace manufacturing were moved to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

3.2.2 Decontamination and Coating Methods

Prior to the initiation of cleanup activities at the facility, all moveable equipment and materials will be removed from the areas to be cleaned. The 12,150 square feet of bare, PCB-contaminated concrete floor will be cleaned in accordance with the double wash/rinse procedure described in 40 CFR 761 Subpart S. This procedure is intended for the decontamination of non-porous surfaces, but 761.30(p) requires that this method be used to prepare PCB-contaminated concrete for encapsulation. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include 1) high-pressure steam wash with concrete cleaner/degreaser, 2) potable water rinse, 3) power scrub with a cleaning/degreasing and muriatic acid etchant solution, and 4) high-pressure steam rinse.

The 7,000 square feet of epoxy-coated, PCB-contaminated concrete floors will be cleaned in a manner less stringent that the double wash/rinse procedure. The reason for this is that while bulk concrete samples collected from below the epoxy-coated surface in this area contained elevated levels of PCBs, wipe samples taken from the top of the epoxy-coated surface did not exhibit PCBs above 10 µg/100 cm^2. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include a 1) high-pressure steam wash with concrete cleaner/degreaser, 2) a light scuffing of the epoxy-coated surface with 100+ grit sandpaper, and 3) a final vacuum and rinse.

Following the surface washing activities and once the surface has been allowed to dry for a minimum of 24 hours, an epoxy encapsulant will be placed on the concrete surface according to the requirements of 40 CFR 761.30(p)(1)(iii)(A). Two coats of epoxy will be applied to the floor surface. The two coats of epoxy will consist of contrasting colors so that any wearing of the topcoat can be detected. In the area where a white epoxy coating already exists, one additional coat will be applied in a contrasting color.

Once the epoxy has dried, labels will be placed on the encapsulated floor surfaces to indicate that PCBs remain in the underlying concrete as specified under 40 CFR 761.30(p)(1)(iii)(B). The labels, described in 761.45, will be applied at the entrances, corners, and central portions of the encapsulated area.

3.2.3 Disposal

Wastes generated during the double wash/rinse procedure and encapsulation may include water mixed with detergent, water mixed with spent degreaser, used absorbent materials, and other equipment. These wastes will be managed according to applicable waste classification and disposal regulations as specified under 40 CFR 761.378(c).

3.3 Bulk PCB Remediation Waste Removal and Disposal

Besides the 19,150 square feet of PCB-contaminated concrete described above, there were eight non-contiguous concrete sample locations exhibiting PCB concentrations greater than 10 mg/kg (**Figure 7**). These locations include the following:

- Concrete 53 - 12.67 mg/kg PCBs at 0-1 inch, 1.06 mg/kg PCBs at 1-3 inches (Wipe B5 had 2.0 µg/100 cm^2 PCBs);
- Concrete 103 – 40.0 mg/kg PCBs at 0-1 inch, non-detect at 1-3 inches;
- Concrete 178 – 11.00 mg/kg PCBs at 0-1 inch, (Wipe A7 had 4.6 µg/100 cm^2 PCBs);
- Concrete 230 – 11.50 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C3 had 5.6 µg/100 cm^2 PCBs);
- Concrete 239 – 22.0 mg/kg PCBs at 0-1 inch, (Wipe C6 was non-detect);
- Concrete 252 – 11.0 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches;
- Concrete 272 – 10.3 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C4 had 4.5 µg/100 cm^2); and
- Concrete 370 – 16.0 mg/kg PCBs at 0-1 inch.

Given the limited areal and vertical extent of PCBs in these eight locations, SPX will cut out and remove the 10-foot by 10-foot (100-square foot) section of concrete floor surrounding each sample location (**Figure 7**). The entire thickness of the concrete floor will be removed. The bulk PCB remediation wastes will be managed and disposed off-site in a TSCA-permitted landfill according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(2). Since the entire thickness of the concrete floor will be removed in these areas, no confirmation sampling will be conducted.

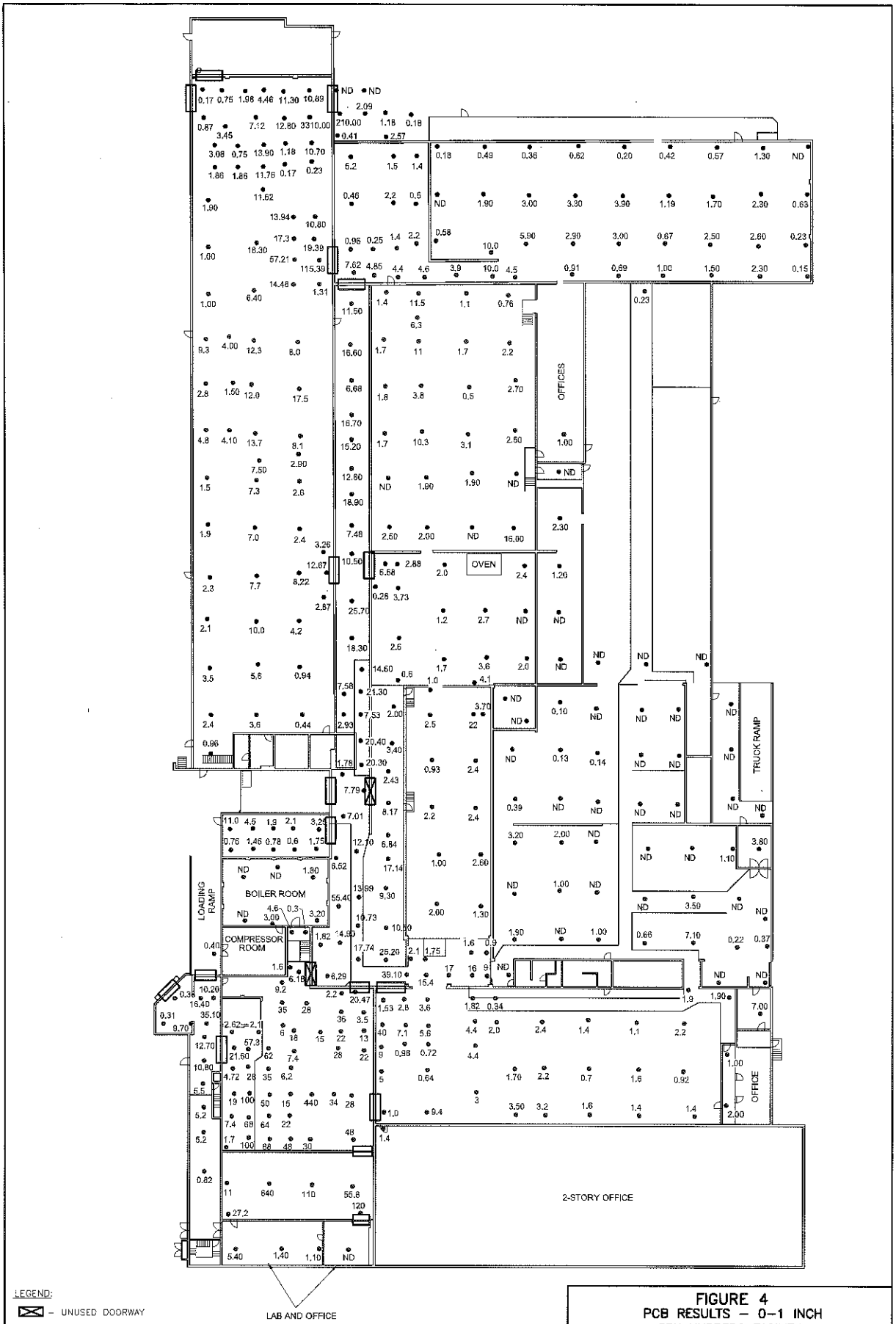
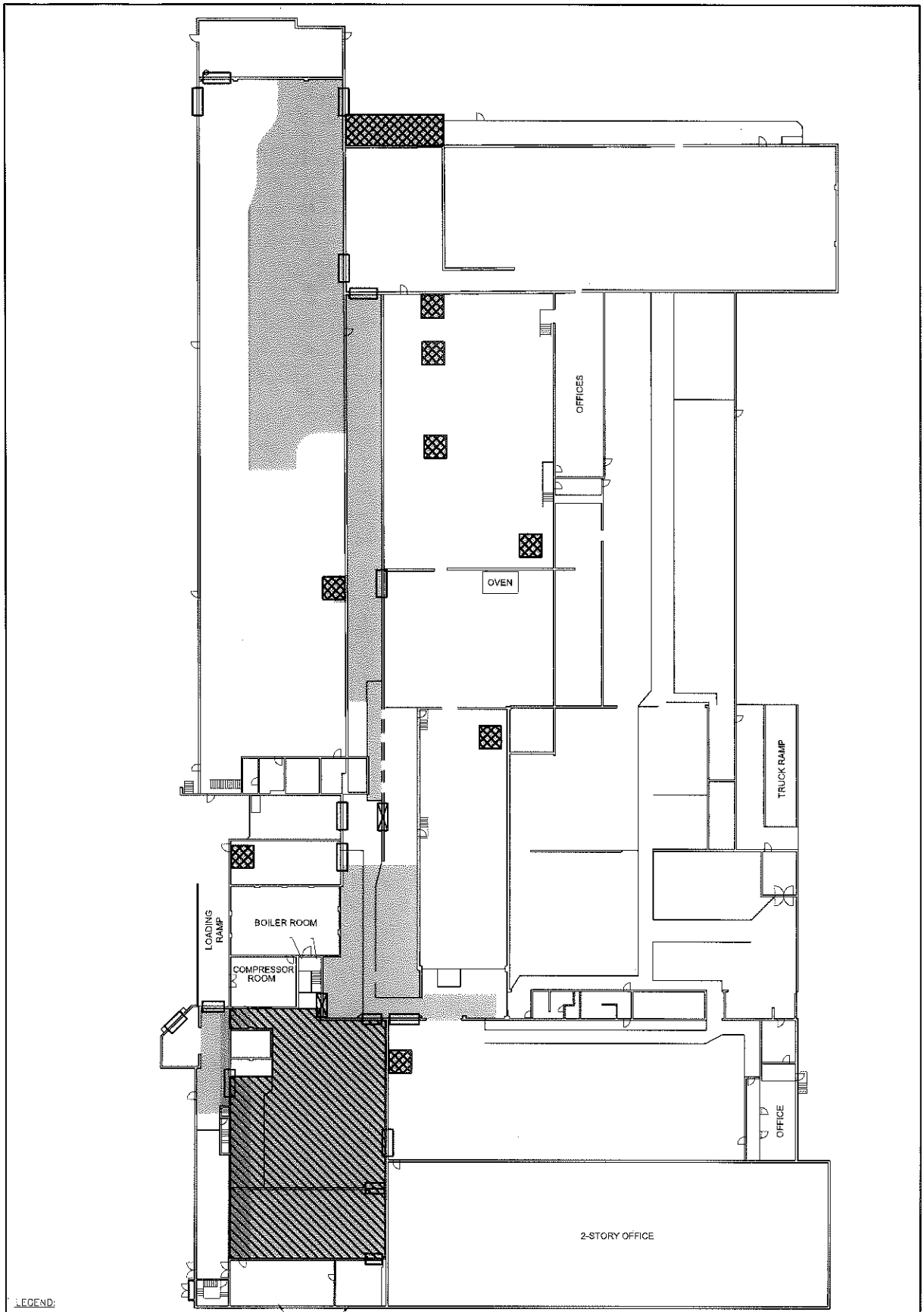


FIGURE 4
PCB RESULTS – 0–1 INCH
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

PROJECT NO.	PREPARED BY	DRAWN BY	
9M0909245	XT	DD	
DATE	REVIEWED BY	FILE NAME	
7/12/10		Watertown-8	DELTA®



8 areas

FIGURE 7
PROPOSED REMEDIATION METHODS
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

PROJECT NO.	PREPARED BY	DRAWN BY
9M0909245	KT	DD
DATE	REVIEWED BY	FILE NAME
12/2/10		Watertown-8

DELTA®

Ginger

RE: Proposed dates for phone conference
Karen Thole to: Nate Nemani 11/24/2010 02:11 PM
Cc: dan.mcgrade, Virginia.Sunde, Peter Ramanauskas, Mario Mangino

Monday, November 29 at 2:00 pm (Chicago time) works for us. Please call 1-800-569-1949 and enter passcode 189982 for the conference call.

Thank you.

Room 916

Karen J. Thole, P.G.
Project Hydrogeologist

Delta Consultants
5910 Rice Creek Parkway, Suite 100
Shoreview, MN 55126

(651) 697-5203 - direct dial
(800) 477-7411 - toll free
(651) 639-9473 - fax

kthole@deltaenv.com

From: Nemani.Nate@epamail.epa.gov [mailto:Nemani.Nate@epamail.epa.gov]
Sent: Wed 11/24/2010 1:22 PM
To: Karen Thole
Cc: dan.mcgrade@spx.com; Virginia.Sunde@spx.com; Ramanauskas.Peter@epamail.epa.gov; Mangino.Mario@epamail.epa.gov
Subject: Re: Proposed dates for phone conference

Karen:

The only date and time that seems to work for us is 11/29 (Monday) at 2:00 PM , Chicago time.

Please confirm if it is OK, ASAP.

Thanks

Nate

NATE NEMANI, P.E.
RCRA CORRECTIVE ACTION PROJECT MANAGER
LAND AND CHEMICALS DIVISION
REMEDIATION AND REUSE BRANCH,
U. S.EPA, REGION 5 ,
77 W JACKSON Blvd, CHICAGO,ILLINOIS,60604, Mail Code: LU-9J
(312) 886-3224 (PHONE)
(312) 692-2176 (FAX)
nemani.nate@epa.gov (e-mail address)

From:	"Karen Thole" <kthole@deltaenv.com>
To:	Nate Nemani/R5/USEPA/US@EPA
Cc:	<Virginia.Sunde@spx.com>, <dan.mcgrade@spx.com>
Date:	11/23/2010 03:28 PM
Subject:	Proposed dates for phone conference

Nate,

Here are a few proposed dates for our telephone conference regarding the Risk-Based Remediation Plan for PCB Contaminated Concrete at the SPX Lindberg facility:

November 29, 30
December 1, 2, 7, 8, 9

Please let me know if any of these dates work for you.

Attending the telephone conference from SPX will be Virgina Sunde, Assistant Director, Environmental, and Dan McGrade, Director, Environmental.

Karen J. Thole, P.G.
Project Hydrogeologist

Delta Consultants

5910 Rice Creek Parkway, Suite 100
Shoreview, MN 55126

(651) 697-5203 - direct dial
(800) 477-7411 - toll free
(651) 639-9473 - fax

kthole@deltaenv.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 19 2010

LU-9J

Ms. Karen J Thole, P.G.
Delta Consultants
5910 Rice Creek Parkway, Suite 100
St. Paul, Minnesota, 55126

RE: Re. SPX Lindberg Facility
Watertown, Wisconsin
Risk- Based Remediation Plan for PCB Contaminated Concrete

Dear Ms. Thole:

The U.S. Environmental Protection Agency, Region 5, has reviewed your request for a Risk- Based Remediation Plan (Plan) approval under 40 C.F.R 761.61(c) of the TSCA Regulations. The Plan was outlined in a report dated August 11, 2010 for PCB Contaminated Concrete at the subject facility.

The report describes a Remediation Plan to address PCB impacted concrete at the facility building located in Watertown, Wisconsin and is preceded by characterization of the concrete floors across the facility. As part of characterization plan for the facility, a number of PCB Wipe samples and PCB Bulk Concrete samples, at varying depth were taken at the facility.

The report describes a proposed clean-up plan that includes off-site disposal of PCB remediation waste, engineered controls and a deed restriction. The proposed plan also calls for leaving in place PCB remediation waste that has a concentration above 10 milligrams per kilogram (mg/kg) PCB in some locations.

A review of the remediation measures in the plan shows that while a portion of the concrete pad exceeding 10 mg/kg is proposed to be removed and disposed off-site per applicable TSCA regulations, there are other areas in the building with concentrations exceeding this value that are proposed to be left in place. It is recognized that specific clean-up procedures are proposed to be implemented for these areas. However, the plan does not address certain issues pertaining to the future use of the facility as it relates to "high/ low occupancy" (as described in the TSCA regulations). This is a factor that is directly linked to potential human exposures and their corresponding risks.

Please provide details on the plans to address the above issues as well as a rationale/justification for the remedial procedures proposed for the different areas and how

leaving greater than 10 mg/kg concentrations in concrete will be protective for planned facility use. Alternatively, you may request a meeting in person or by phone so that the issues can be discussed in more detail.

If you have any further questions, please feel free to contact me at nemani.nate@epa.gov or by phone at (312) 886-3224.

Sincerely,

N. Nemani

Nate Nemani, P.E.
Correction Action Project Manager
Land and Chemicals Division

cc: Jeff Ackerman WDNR

SPX

August 13, 2010

Ms. Susan Hedman
Regional Administrator
US EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Mr. Matthew Frank
Secretary
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

Mr. Jeff Ackerman
Wisconsin DNR South Central Region
Division of Air and Waste
Remediation and Redevelopment
3911 Fish Hatchery Road
Fitchburg WI 53711

Subject: *Risk-Based Remediation Plan Written Certification*
SPX Lindberg Facility
304 Hart Street
Watertown, Wisconsin
Delta Project No. 9M0909245

Dear Ms. Hedman, Mr. Frank, and Mr. Ackerman:

The purpose of this correspondence is to provide written certification as required in the Code of Federal Regulations, Title 40, Volume 29, Part 761.61(a)(3)(i)(E) for the risk-based cleanup at the SPX Lindberg facility located at 304 Hart Street in Watertown, Wisconsin. A document entitled *Risk-Based Remediation Plan for PCB-Contaminated Concrete*, dated August 11, 2010, (sent separately) has been submitted for your review.

As a representative of SPX, which is both the owner of the property and the party conducting the cleanup, I certify that a file containing copies of all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the facility are maintained at the facility and are available for EPA inspection.

If you have any questions regarding this information or the project in general, please contact Ms. Karen Thole of Delta Consultants at (651) 697-5203.

Sincerely,

SPX Corporation

SPX CORPORATION
13515 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277
UNITED STATES OF AMERICA

Virginia Sunde
Assistant Director, Environmental

cc: Karen Thole, Delta-Milwaukee

August 11, 2010

Ms. Susan Hedman
Regional Administrator
US EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Mr. Matthew Frank
Secretary
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

Mr. Jeff Ackerman
Wisconsin DNR South Central Region
Division of Air and Waste
Remediation and Redevelopment
3911 Fish Hatchery Road
Fitchburg WI 53711

DELTA

Subject: *Risk-Based Remediation Plan for PCB-Contaminated Concrete*
SPX Lindberg Facility
304 Hart Street
Watertown, Wisconsin
Delta Project No. 9M0909245

Dear Ms. Hedman, Mr. Frank, and Mr. Ackerman:

The purpose of this correspondence is to submit the *Risk-based Remediation Plan for PCB-Contaminated Concrete* for management of polychlorinated biphenyl (PCB)-contaminated concrete at the SPX Lindberg facility, a manufacturing facility located in Watertown, Wisconsin. This report fulfills the application requirements of the Environmental Protection Agency (EPA) Toxic Substance Control Act (TSCA) PCB regulations, 40 CFR 761.61(c) *Risk-based disposal approval* for PCB remediation waste.

SPX is proposing to implement the 40 CFR 761.30(p) *continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* authorization for the in-place management of PCB-contaminated concrete at the facility and is requesting a risk-based cleanup level of ≤10 milligrams per kilogram (mg/kg) PCBs.

If you have any questions regarding the attached report, please contact me at (651) 697-5203.

Sincerely,
DELTA CONSULTANTS

Karen J. Thole, P.G.
Project Hydrogeologist

Enclosure

cc. Dan McGrade – SPX Corporation
Virginia Sunde – SPX Corporation

WISCONSIN
DEPT. OF NATURAL RESOURCES

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew Frank, Secretary
Lloyd L. Eagan, Regional Director

South Central Region Headquarters
3911 Fish Hatchery Road
Fitchburg, Wisconsin 53711-5397
Telephone 608-275-3266
FAX 608-275-3338
TDD 608-275-3231

March 25, 2010

BRRTS # 02-28-555133

Mr. Dan McGrade
SPX Corporation
13515 Ballantyne Corporate Place
Charlotte NC 28277

SUBJECT: Reported Contamination at: **Lindberg MPH Facility, 304 Hart St. Watertown WI**

Dear Mr. McGrade:

On February 16, 2010 Karen Thole representing Delta Consultants notified the Department of Natural Resources that groundwater contamination via VOC's had been detected at the site listed above. Based on the information submitted to the Wisconsin Department of Natural Resources (WDNR), we believe you are responsible for restoring the environment at the referenced site under Section 292, Wisconsin Stats., known as the hazardous substances spills law.

This letter describes your legal responsibilities, explains what you need to do to investigate and clean up the contamination, and provides you with information about cleanups, environmental consultants, possible financial assistance, and working cooperatively with the Departments of Natural Resources and Commerce.

Legal Responsibilities:
Your legal responsibilities are defined both in statute and in administrative codes. The hazardous substances spill law, Section 292.11 (3) Wisconsin Stats, states:

- RESPONSIBILITY. A person who possesses or controls a hazardous substance which is discharged or who causes the discharge of a hazardous substance shall take the actions necessary to restore the environment to the extent practicable and minimize the harmful effects from the discharge to the air, lands, or waters of the state.

Wisconsin Administrative Code chapters NR 700 through NR 749 establish requirements for emergency and interim actions, public information, site investigations, design and operation of remedial action systems, and case closure. Chapter NR 708 includes provisions for immediate actions in response to limited contamination. Wisconsin Administrative Code chapter NR 140 establishes groundwater standards for contaminants that reach groundwater.

Steps to Take:

The longer contamination is left in the environment the farther it can spread and the more it may cost to clean up. Quick action may lessen damage to your property and neighboring properties and reduce your costs in investigating and cleaning up the contamination. To ensure that your cleanup complies with Wisconsin's laws and administrative codes, you should hire a professional environmental consultant who understands what needs to be done. These are the first three steps to take:

1. Within the next 30 days, you must submit written verification (such as a letter from the consultant) that you have hired an environmental consultant.

2. Within the next 60 days, your consultant must submit a workplan and schedule for the investigation. The consultant must follow the DNR administrative codes and technical guidance documents.

   Once an investigation has established the type and severity of contamination involved at your site, your consultant will be able to determine whether the Department of Commerce or the Department of Natural Resources has authority over the case. The decision will be reviewed by agency staff, and you will be notified by mail if the case is being transferred to Commerce. In general, cases involving petroleum products that have leaked from either above ground or underground storage systems will be reviewed by the Commerce, unless high risk criteria are involved.

3. Please inform the appropriate agency of what is being done at your site. If the site meets criteria for a "simple site", progress reports must be submitted semi-annually, beginning 6 months from the initial notification date. If the site meets criteria for a "complex site", a complete site investigation report and a draft remedial options report must be submitted within 30 days of completion. In addition, you or your consultant must provide a brief report at least every 90 days. Quarterly reports need only include one or two pages of text, plus any relevant maps and tables. Should conditions at your site warrant, we may require more frequent contacts.

If you want a formal response from the agency on a specific submittal, please be aware that a review fee is required in accordance with s. NR 749, Wis. Adm. Code. If a fee is not submitted with your reports, you should proceed under the advice of your consultant to complete the site investigation to maintain your compliance with the spills law and chs. NR 700 through NR 749. **Do not delay the investigation of your site by waiting for an agency response.** We have provided detailed technical guidance to environmental consultants. Your consultant is expected to know our technical procedures and administrative codes and should be able to answer your questions on meeting cleanup requirements."
Unless you are notified that your case has been transferred to Commerce, all correspondence regarding this site should be sent to:

Jeff Ackerman
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Madison, WI 53711

Unless otherwise requested, please send only one copy of plans and reports. To speed processing, correspondence should reference the BRRTS and FID numbers (if assigned) shown at the top of this letter.

Information for Site Owners:
Information to help you select a consultant, and materials on controlling costs, understanding the cleanup process, and choosing a site cleanup method are enclosed. For information on obtaining limited liability under Section 292.15, Wisconsin Stats., please see our website at http://www.dnr.state.wi.us/org/aw/rr/liability.

Financial Assistance:
Reimbursement from the Petroleum Environmental Cleanup Fund (PECFA) is available for the costs of cleaning up contamination from eligible petroleum storage tanks. Please refer to the enclosed information sheet entitled *Site Remediation Using PECFA* for more information on eligibility and regulations for this program.

Thank you for your cooperation.

Sincerely,

Wendy Heikemeller (for)

Jeff Ackerman
Telephone: (608) 275-3323
Enclosures

Cc – File
Karen Thole Delta Consultants

SUMMARY OF RISK-BASED REMEDIATION PLAN FOR

PCB-CONTAMINATED CONCRETE

SPX Lindberg Facility
304 Hart Street
Watertown, Wisconsin

Background Info

- SPX Lindberg facility consists of a 174,000 square foot manufacturing and office building on approximately 5.3 acres.
- The facility manufactured electrical transformers in the 1950s through 1971.
- From 1971 to 2005, the facility manufactured industrial ovens, refrigeration units, environmental test chambers, industrial manufacturing furnaces, and custom products.
- Manufacturing operations were terminated in late 2005.

Site Characterization Data

- A total of 72 wipe samples were collected from the floor throughout the facility in an approximate 60-foot grid pattern. Ten wipe samples indicated PCB concentrations greater than 10 µg/100 cm^2, with the highest being 59.7 µg/100 cm^2.
- A total of 585 bulk concrete samples were collected from 406 locations throughout the facility. Of the 406 near-surface (0 to 1 inch deep) concrete samples collected, 95 samples exhibited PCB concentrations above 10 mg/kg PCBs. These sample locations are shown as the shaded areas in **Figure 6**.

Proposed Remediation Plan

- Based on its industrial use and limited accessibility, a risk-based cleanup level of ≤10 mg/kg is being requested for this facility.
- Approximately 20,650 square feet of concrete contains PCBs at concentrations greater than 10 mg/kg (**Figure 6**).
- Based on results of sample analysis and condition/location of concrete floor, we have designated 5 separate areas within the facility.
    1. 700 square-foot concrete pad located outside of building in the rail spur loading area exhibiting PCB concentrations greater than 1 mg/kg (cross-hatch pattern on **Figure 7**).
    2. 12,150 square feet of bare concrete flooring exhibiting PCB concentrations greater than 10 mg/kg (shaded on **Figure 7**).
    3. 7,000 square feet of epoxy-coated concrete flooring exhibiting PCB concentrations greater than 10 mg/kg (diagonal-hatch pattern on **Figure 7**).
    4. Eight non-contiguous sample locations exhibiting PCB concentrations greater than 10 mg/kg (horizonal-hatch pattern on **Figure 7**).
    5. The remaining concrete flooring exhibiting PCB concentrations less than or equal to 10 mg/kg PCBs (not shaded on **Figure 7**).

- Proposed remediation plan for each of the 5 areas is as follows:

1. Concrete Pad in Rail Spur Loading Area

- Remove the entire concrete pad in accordance with 40 CFR 761.61(a)(5)(i).
- Manage and dispose the bulk PCB remediation wastes off-site according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(*2*).
- Collect confirmation sample from the soil beneath the location of sample Concrete 36 (210 mg/kg PCBs) for laboratory analysis for PCBs by EPA Method 8082.

2. Bare Concrete Flooring with PCBs >10 mg/kg

- Continue to use contaminated concrete floor in accordance with the Continued Use Authorization as specified in 40 CFR 761.30(p)
- Clean accessible floors per the double wash rinse procedure in Subpart S.
- Apply two coats of solvent resistant and water repellent epoxy of contrasting colors.
- Mark the encapsulated floor surfaces with labels to indicate that PCBs remain in the underlying concrete as specified under 40 CFR 761.30(p)(1)(iii)(B).
- Record a notation on the deed to the property within 60 days of the completion of the cleanup activities in accordance with 40 CFR 761.61(a)(8)(i).

3. Epoxy-Coated Concrete Flooring with PCBs >10 mg/kg

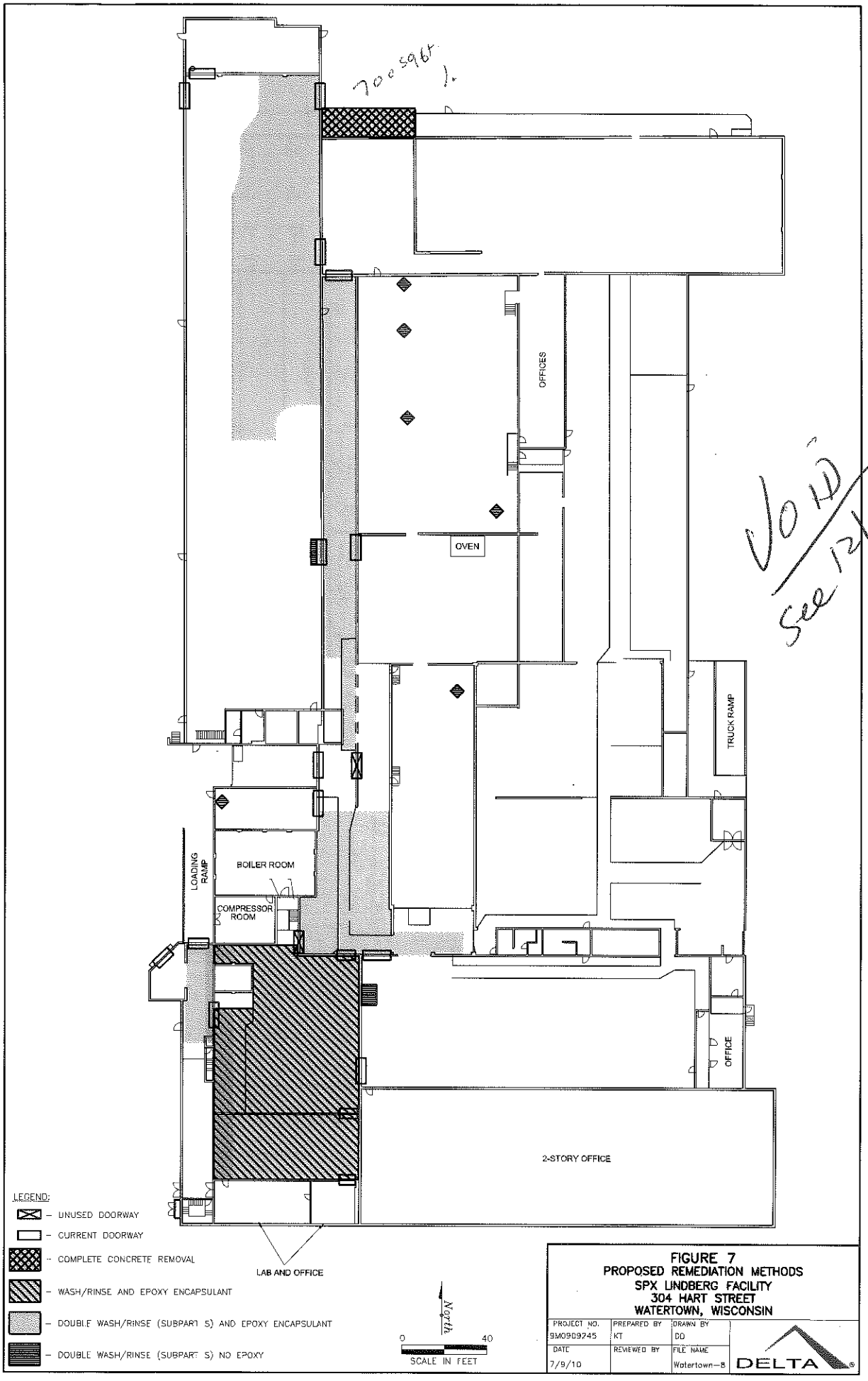
- Continue to use contaminated concrete floor in accordance with the Continued Use Authorization as specified in 40 CFR 761.30(p)
- Clean accessible floors in a manner less stringent cleaning method than the double wash rinse procedure to maintain the integrity of the existing epoxy surface.
- Apply two coats of solvent resistant and water repellent epoxy of contrasting colors.
- Mark the encapsulated floor surfaces with labels to indicate that PCBs remain in the underlying concrete as specified under 40 CFR 761.30(p)(1)(iii)(B).
- Record a notation on the deed to the property within 60 days of the completion of the cleanup activities in accordance with 40 CFR 761.61(a)(8)(i).

4. Concrete Flooring at Non-Contiguous Locations with PCBs >10 mg/kg

- Continue to use contaminated concrete floor in accordance with the Continued Use Authorization as specified in 40 CFR 761.30(p)
- Clean accessible floors per the double wash rinse procedure in Subpart S.
- Collect bulk concrete confirmation sample at each location for laboratory analysis for PCBs by EPA Method 8082.
- If the sample result indicates a PCB concentration of ≤10 mg/kg, the sample location would be considered to be a part of Area 5 and remediated accordingly.
- If the sample result indicates a PCB concentration greater than 10 mg/kg, the sample location would be considered to be a part of Area 2 and remediated accordingly.

5. Remaining Concrete Flooring

- Continue to use concrete floor with no remediation.
- Record a notation on the deed to the property within 60 days of the completion of the cleanup activities in accordance with 40 CFR 761.61(a)(8)(i) restricting the property to industrial use only.



VOID
See 12/2/10 Version update

FIGURE 7
PROPOSED REMEDIATION METHODS
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

PROJECT NO.	PREPARED BY	DRAWN BY
9M0909245	KT	DD
DATE	REVIEWED BY	FILE NAME
7/9/10		Watertown-8

DELTA®

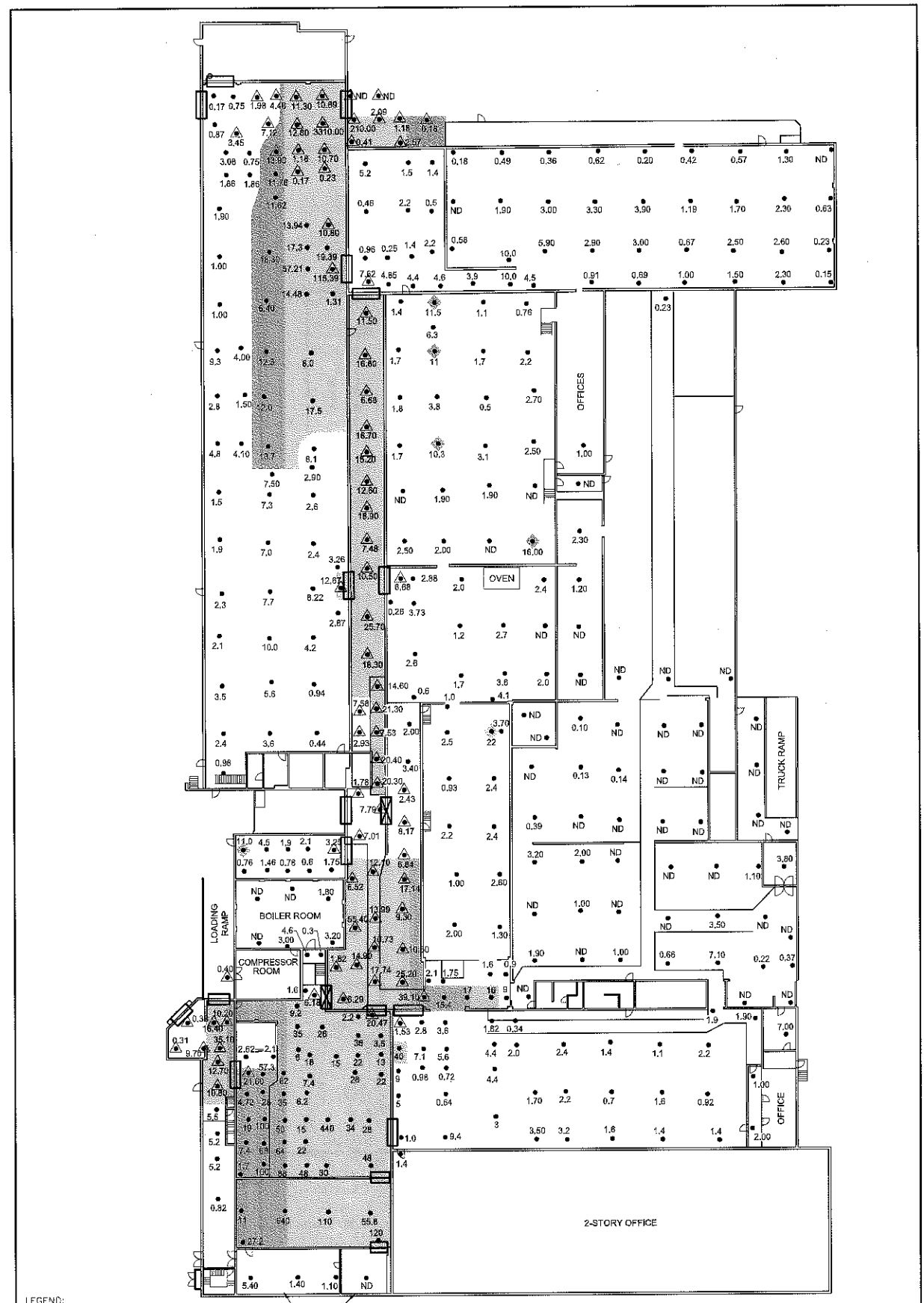


FIGURE 6
PROPOSED AREAL EXTENT OF REMEDIATION
SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN

PROJECT NO.	PREPARED BY	DRAWN BY
9M0909245	KT	DD
DATE	REVIEWED BY	FILE NAME
7/9/10		Watertown-8

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E-Mail Address: walter.galacki@spx.com

December 22, 2014

USEPA
Region 5
TSCA/PCB Coordinator
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: Nate Nemani, L-8J

Re: SPX Corporation former Lindberg Facility
304 Hart Street
Watertown, WI 53094
Revised Report and Cleanup Plan

Gentlemen:

As recently discussed between TRC, SPX's environmental consultant, and USEPA's Nate Nemani, SPX is submitting this revised information to notify and certify to the Agency and all concerned (the EPA Regional Administrator, the Secretary of the WI DNR, Jefferson County, and the City of Watertown) that SPX intends to conduct a "self-implementing on-site cleanup and disposal of PCB remediation waste" for the captioned site.

SPX had previously received EPA's approval for a partial removal of PCB surficially contaminated concrete flooring and encapsulation of other flooring (40 CFR 761.61 (c)) dated 28 March 2011. As discussed, based on the deteriorating condition of the building and in consultation with the City, SPX has decided to demolish the building and all associated structures and completely remediate the facility in accord with 40 CFR 761.61 (a)(3).

Enclosed is documentation covering the nature of the PCB contamination, the summary of procedures and methods for sampling, characterization and analysis, the location and extent of the contamination, and a cleanup plan including schedule, disposal plan and the demolition and remedial approach.

SPX CORPORATION
13320 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277-2706
UNITED STATES OF AMERICA

www.spx.com

Since we believed that we were close to an EPA approval some time ago, we are asking for an expedited review of this material in order that our demolition and remediation contractor may continue with his work at the site. Should you need any further information please contact our consultant, Dave McNichol of TRC immediately.

Thank you in advance for your attention to this matter.

Very truly yours,

Walter Galacki
Director Environmental
For SPX Corporation, Owner and Operator and Successor in Interest of the former SPX Lindberg site

W/enclosures

CC: Jefferson County Health Department, Environmental Health Section
WI DNR, Remediation and Redevelopment Program
City of Watertown, J.J. Holloway, PE
TRC, Dave McNichol
Nixon Peabody, Al Floro

SELF-IMPLEMENTING ON-SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE

November 2014
REVISED December 19, 2014

SPX LINDBERG FACILITY,
304 Hart Street, Watertown, WI

TRC Project No.: 218588-0000-0000

SPX Corporation
13320 Ballantyne Corporate Place
Charlotte, NC 28277-2706

Prepared By:

500 Bic Drive, Suite 103
Milford, Connecticut 06461
Telephone: 203-876-1453
Facsimile: 203-876-1406

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TABLE OF CONTENTS

1.0 INTRODUCTION

1.1 PURPOSE

SPX Corporation (SPX) wishes to perform under 40 CFR 761.61 (a) (3) a *Self-implementing on-site cleanup and disposal of PCB remediation waste* at the SPX Lindberg facility located at 304 Hart Street, Watertown, WI 53094. The entire project also involves the complete demolition and remediation of the facility. SPX had received EPA's approval for a risk-based approach under 40 CFR 761.61(c). See EPA letter dated March 28, 2011.

SPX, however, no longer believes the facility is useful in its' deteriorated condition and now wishes to completely demolish the buildings and remediate the site and seeks, with the help of the City of Watertown, to find a redeveloper. Thus, SPX is seeking EPA's approval under 40 CFR 761.61(a)(3) in order to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

1.2 BACKGROUND

Delta Consultants, Shoreview, MN has investigated the Lindberg facility for PCBs and has reported on those investigations. EPA's prior approval (March 28, 2011) was based upon that reporting. TRC has been engaged by SPX to manage/oversee the remediation and demolition. As such TRC and SPX are continuing to rely upon Delta's earlier work and their report "Risk-Based Remediation Plan for PCB-Contaminated Concrete" dated August 2, 2010 and (the subsequent modifications and revisions through December 6, 2010) it is incorporated herein. For the reader's convenience and reference the material follows this report.

The PCB contamination observed at the former Lindberg facility is believed to have been from the manufacture of electrical transformers during a period from 1953 until 1971. No spill event nor history has been identified through a historical review as well as interviews with former employees. The primary PCB contamination is of concrete flooring (within the building) and to a lesser extent a small area outside the building which is a small loading/shipping pad and adjacent soils. Notably, the PCB contamination is not at depth in the concrete flooring, thus PCB contamination is not expected in the substrate beneath any flooring. See especially the Figures in the Delta Report.

SPX, in conjunction with the facilities full demolition and remediation, will remove all Asbestos Containing Building Materials (ACM), Universal Waste (batteries, lamps-both florescent and metal-halide, mercury in electrical components, CPUs, etc.), decommission all firewater, electric, gas, water and sewer, remove all oils, lubes, etc. For the demolition all C & D waste will be disposed at the local Subtitle D (Solid Waste) landfill operated by Waste Management and located in Watertown. The ACM is to be transported and disposed at the Pheasant Run Landfill operated by Waste Management and located in Bristol, WI. Universal waste is destined for Mercury Waste Solutions in Union Grove, WI. And, the PCB concrete along with a minor amount of soil (loading pad area) would be manifested and

transported to a Subtitle C (Hazardous Waste) Landfill operated by Heritage Environmental Services located in Roachdale, IN.

2.0 NATURE OF PCB CONTAMINATION

The nature of the contamination is fully described and explained by Delta in their report. The sampling, the analysis, the PCB results and the graphic (figures) pattern of PCB contamination is all contained in Section 2 of their report. SPX and TRC are relying on this information for the Cleanup discussion which follows in Section 3. Please see Section 2 of the Delta report for a description of the nature of the contamination.

3.0 CLEAN UP PLAN

The SPX former Lindberg facility had been principally, over its long history, a manufacturer of industrial ovens, furnaces, and environmental test chambers with an associated business office activity. Early in its history the facility had also produced electrical transformers. The PCB contamination at the facility results from its manufacture of electrical transformers. The manufacturing areas were in some cases added buildings and in other cases large rooms or other functional areas within a given building-see figures. SPX will perform a self-implementing clean up resulting in PCB concentrations for the site of less than 0.74 mg/kg. This will allow unlimited use for the remaining land under EPA criteria after all remediation and demolition are completed [40 CFR 761.61(a)(4)(i)(A)]. The site, since it will be cleaned up to less than 0.74 mg/kg PCBs, will only be eligible for unlimited commercial or industrial use (**not residential**) under Wisconsin criteria. Thus the sites future use can only be commercial or industrial. A Deed Notice will be entered recording this environmental land use restriction. The proposed clean up includes the removal of PCB contaminated concrete, the removal of a minor quantity of PCB contaminated soils and a loading pad (only outdoor area), and the transportation and disposal of these materials to a RCRA Subtitle C facility all as more fully described below.

3.1 Bulk PCB Remediation Waste Removal and Disposal

SPX intends to remove all of the concrete flooring shown on Figure 1 as PCB remediation waste. The five areas shown on the Figure will completely and conservatively remove and dispose of any concrete flooring with a PCB concentration of 50 mg/kg or above. The contractor hired by SPX, Apollo Dismantling, has mobilized to the site and is currently preparing for the demolition and remediation. At the moment Apollo and its subcontractors are removing all ACM, removing all Universal wastes, collecting all lamps and ballasts, and draining and arranging for utility shutoffs and blocks. Once this work is completed Apollo had planned to cut out and remove all of the PCB concrete for Title C Landfill disposal. See schedule below.

The concrete removal will be in all cases to full floor depth. In addition, SPX proposes to remove to the next core location (still locatable) where a measured result is less than 50 mg/kg content. Thus existing measured values and full depth floor removal ensures the cleanup objective is met. The removed flooring will then be manifested, transported and disposed at the Subtitle C landfill operated by Heritage Environmental Services located in Roachdale, Indiana.

Remaining flooring will then be removed from all areas (rooms and/or buildings). The material will be sized and placed in a single on site pile for further use on site, if possible. Prior to any on-site use the pile will be sampled and analyzed to ensure that the material is less than 0.74 mg/kg PCB content. If less than, the material is candidate material for onsite use to fill any basement voids and grade the site after the demolition. Should the any pile material test greater than 0.74 mg/kg it will not be used onsite but will be disposed into a Subtitle D landfill, either for temporary cover or as fill. Thus any PCB concrete

greater than 50 mg/kg (and minor soils quantity) will be disposed at a Subtitle C (Hazardous Waste) facility; any PCB concrete greater than 0.74 mg/kg will be disposed in a Subtitle D (Solid Waste) landfill facility; and, any PCB concrete less than 0.74 mg/kg may be retained for use to fill basement voids onsite and grading-or if an excessive quantity exists, may also be disposed in the same Subtitle D landfill facility.

3.2 SCHEDULE

The schedule is as follows:

ACM removal, 24 Oct-23 Dec/14
PCB remediation waste removal, 15 Jan-28 Feb/15
Lights/ballasts/U waste, 17 Nov-15 Dec/14
Demolition, 5 Jan-28 Feb/15
Site Restoration, Mar-Apr/15

3.3 Verification

Verification sampling will be performed under all five PCB remediation waste removal areas. See Figure 2 for proposed sample locations. ASTM Method D2974 will be used for moisture content and EPA Method 8082 will be used for sample analysis. Reporting will be for the seven congeners required by WI DNR and total PCB. The outdoor excavation will be sampled with 2-sidewalls samples and a bottom invert sample. Any concrete pile proposed for onsite reuse (filling and grading) will be sampled with 6 samples, composited to 2 for analysis.

3.4 Site Restoration

After completion of all the demolition and remediation activities the site will be restored. The front side walk on Hart Street will remain. The voids of former basement areas will be filled with the concrete from the less than 0.74 mg/kg pile (assuming it has been verified as described herein). After the voids are filled fresh stone will be imported to cover the graded concrete areas. The site will be somewhat crowned to allow that no ponding should occur over time. The property will then be idle until redevelopment can be planned and implemented.

4.0 Deed Notice

SPX Corporation will prepare and have entered a Deed Notice which will limit the property uses to commercial and/or industrial only. The use of the property for residential purposes will be prohibited. Full-time commercial or industrial uses will be allowed since the clean up to less than 0.74 mg/kg PCBs meet the criteria for both EPA and WI DNR.

5.0 Certification

SPX Corporation as the Owner and Operator and Successor in Interest of the former SPX Lindberg site hereby certifies and notifies that the site located at:

304 Hart Street, City of Watertown, County of Jefferson, Wisconsin (The former Lindberg facility)

(SPX) is proposing a "self-implementing on-site cleanup and disposal of PCB remediation waste", and as such SPX has engaged Apollo Dismantling Services, LLC of Niagara Falls, NY to perform the remediation and proper disposal of the site PCB remediation waste, further

a complete package of all PCB sampling, analysis, results, maps, and other PCB related documents will be available on site for EPA's inspection anytime throughout the duration of the project. All information will be available electronically in the Apollo field construction trailer located at the site.

6.0 RECORDKEEPING

A file containing all sampling, analysis, results, graphic depictions of results, shipping and manifesting documents including weight tickets and summaries will be created. Several electronic copies of the record compilation will be made. An electronic copy will be forwarded to USEPA Region 5 PCB Coordinator and to WI DNR PCB Section.

Since this is a cleanup to less than 0.74 mg/kg PCB no further environmental actions are anticipated under 40 CFR 761.61.

RISK-BASED REMEDIATION PLAN FOR
PCB-CONTAMINATED CONCRETE

SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA PROJECT NO. 9M0909245

1.0 INTRODUCTION

1.1 Purpose

Delta Consultants (Delta), on behalf of SPX Corporation (SPX), is pleased to present this *Risk-based Remediation Plan for PCB-Contaminated Concrete* for management of polychlorinated biphenyl (PCB)-contaminated concrete at the SPX Lindberg facility located at 304 Hart Street in Watertown, Wisconsin (**Figure 1**). The purpose of this report is to fulfill the application requirements of the Environmental Protection Agency (EPA) Toxic Substance Control Act (TSCA) PCB regulations, 40 CFR 761.61(c) *Risk-based disposal approval* for PCB remediation waste. This report presents the following:

- Site characterization data collected to date;
- Proposed cleanup plan for the facility; and
- Plan for future management of the PCB-contaminated soil and concrete.

Since the proposed cleanup plan includes off-site disposal of PCB remediation waste, engineered controls, and a deed restriction to limit exposure, this Risk-based Remediation Plan is being submitted with the goal of allowing PCB remediation waste to remain at the facility at a concentration of 10 milligrams per kilogram (mg/kg) PCBs.

1.2 Background Information

The SPX Lindberg facility is located 1,000 feet east of the Rock River and immediately south of the Chicago, Milwaukee, St. Paul and Pacific railroad in Watertown, Jefferson County, Wisconsin (**Figure 1**). The subject property consists of approximately 5.3 acres of land that is occupied by an approximately 174,000 square foot manufacturing and office building. The Subject Property is bordered by a storage warehouse and railroad tracks to the north, a JohnsonDiversey (formerly U.S. Chemical Company) facility to the east, Hart Street and a parking lot to the south, and residential buildings to the west.

The subject property was originally developed in the early 1920s as a woodworking/ manufacturing facility. The majority of the current building infrastructure was constructed in the 1950s, when it was occupied by Hevi-Duty Electric Company, a manufacturer of electrical transformers, heat treating furnaces, and hot plates. According to historical documents, the combined operations of transformer and furnace manufacturing were moved to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

According to Mr. Jeff Raabe, former manufacturing supervisor at the facility and facility employee since 1973, recent operations consisted of the manufacture of a wide array of industrial ovens, refrigeration units, environmental test chambers, industrial manufacturing furnaces, and custom products. Manufacturing operations were terminated at the facility in late 2005. The facility is currently unoccupied and largely vacant and is being placed on the market for sale. The potential future facility use is anticipated to remain industrial.

No PCB releases have been reported or are known to have occurred within the facility. The presence of PCB-contaminated concrete was discovered during routine Phase II Environmental Assessment (EA) activities performed on October 1, 2009, prior to SPX placing the facility up for sale. Sampling activities were performed to evaluate for the potential presence of PCBs on the concrete floor surface. Surface wipe sampling was performed in an approximate 60-foot square-based grid pattern throughout the facility. Of the 49 surface wipe samples collected during the initial testing, five samples indicated PCB concentrations greater than 10 micrograms (µg) per 100 square centimeters (cm^2) total PCBs.

2.0 NATURE OF CONTAMINATION

Between October 2009 and May 2010, Delta has performed six PCB delineation events at the SPX Lindberg facility to assess the extent and magnitude of PCBs on top of and within the concrete floor. These sampling events included both PCB wipe and bulk concrete sampling and occurred on October 1, October 27, and December 28-30, 2009 and January 25-28, March 16-April 2, and May 4-11, 2010. Photographs taken during the sampling events are presented in **Appendix A**.

2.1 PCB Wipe Sampling

In order to initially characterize the horizontal extent of PCBs on the concrete floor surface, a PCB wipe sampling program was performed. A total of 72 wipe samples were collected from the floor in an approximate 60-foot square-based grid pattern throughout the facility. The sample locations are shown on **Figure 2**. No floor coverings were compromised during sample collection; sample locations which were proposed in areas covered with carpeting were moved to the nearest non-carpeted area.

The wipe samples were collected using hexane-preserved sorbent pads provided by Pace Analytical Services, Inc. (Pace). The procedure for obtaining a wipe sample for PCB analysis consisted of rubbing the hexane-soaked pad within a 10 cm by 10 cm (100 cm^2) sample area, using a prescribed wiping pattern that followed the horizontal and vertical axes of the area. The pad was then placed into a 4-ounce amber glass container and the cover was secured tightly on the jar. The wipe samples were submitted to Pace for analysis for PCBs by EPA Method 8082. Laboratory analytical reports for the wipe samples are presented in **Appendix B**.

Analytical results for surface wipe samples are summarized on **Table 1** and **Figure 2**. PCB concentrations ranged from less than the laboratory reporting limit of 1.0 µg per 100 cm^2 to 59.7 µg/100 cm^2. The PCB concentrations were compared against the TSCA PCB surface cleanup standard of 10 µg/100 cm^2. Twenty-six of the wipe samples did not indicate the presence of PCBs. Thirty-six wipe samples contained PCBs at concentrations between 1 and 10 µg/100 cm^2. Ten wipe samples indicated PCB concentrations greater than 10 µg/100 cm^2. These samples included:

26 ∠
36 -
10 >

- B1 (59.7 µg/100 cm^2) and W3 (13.0 µg/100 cm^2), located near the northeast corner of the "Big Bay" area in the vicinity of a loading area;
- W5 (11.7 µg/100 cm^2), B4 (23.7 µg/100 cm^2), W9 (14.4 µg/100 cm^2), B6 (23.2 µg/100 cm^2), and W10 (10.8 µg/100 cm^2), located along the "Heavy Assembly Materials" storage corridor;
- B7 (11.5 µg/100 cm^2) and W33 (12.4 µg/100 cm^2), located south of the "Heavy Assembly Materials" storage corridor near the old shipping office; and
- A8 (10.4 µg/100 cm^2), located in a loading dock area near the southwest corner of the facility.

According to Mr. Raabe, the "Heavy Assembly Materials" area, an approximately 16-foot wide by 315-foot room located in the west-central portion of the facility, was formerly used

as a staging area for parts and equipment prior to being moved into the product assembly rooms.

2.2 PCB Bulk Concrete Sampling

In order to evaluate whether PCBs have penetrated the concrete floor, 585 bulk concrete samples were collected from 406 locations throughout the facility. The locations of these samples are shown on **Figure 3**.

- Concrete samples B1, B4, B6, B7, and A8 were collected at five locations previously sampled using PCB wipe sampling techniques and exhibiting PCB concentrations exceeding the surface standard of 10 µg/100 cm^2 PCBs.
- Concrete samples 1 through 36 were collected within three areas (the northwest loading area, the southwest loading dock, and the "Heavy Assembly Materials" corridor) previously sampled using PCB wipe sampling techniques and exhibiting PCB concentrations exceeding the surface standard of 10 µg/100 cm^2 PCBs.
- Concrete samples 37 through 171 were collected at approximately 10-foot intervals to expand on the areas where PCB impacted concrete was previously identified at concentrations greater than the bulk concrete standard of 1 mg/kg PCBs.
- Concrete samples 172 through 273 were collected at approximately 20-foot intervals to expand on the areas where PCB impacted concrete was previously identified at concentrations greater than the bulk concrete standard of 1 mg/kg PCBs.
- Concrete samples 274 through 401 were collected at approximately 20-foot intervals throughout the remaining manufacturing portions of the facility.

All manufacturing areas of the facility were sampled with the exception of an 11,000-square foot room in the eastern side and a 1,600-square foot room on the northern side. According to Mr. Raabe, the room on the eastern side was constructed circa 1978, which was after the date that transformer production ended at the facility (1971), and was used for oven assembly. The room to the north was added in the early 1990s and was used as a cutting room.

Bulk concrete samples were collected in general accordance with EPA Region 1 *Standard Operating Procedure for Sampling Concrete in the Field* (December 30, 1997). The sample holes were advanced using a hand-held rotary hammer/impact drill equipped with 1-inch and ½-inch masonry bits. The 0-1 inch sample was collected by advancing a hole into the concrete to a depth of one inch using the 1-inch bit. Concrete dust generated from the

drilling of the sample interval was collected using clean disposable sampling tools and placed into a sample jar. The drill hole was vacuumed thoroughly to prevent cross-contamination between sampling intervals. The hole was further advanced to a depth of either 3 (or 4) inches using the ½-inch bit and the concrete dust was collected for the 1-3 (or 2-4) inch sample. The drill bits were decontaminated between holes using a soap and water solution and potable water rinse. Three to four holes were advanced at each sample location to obtain a sufficient sample weight for analysis. The bulk concrete samples were submitted for laboratory analysis for PCBs by EPA Method 8082. Laboratories utilized throughout this project include Pace Analytical Services (Minneapolis, Minnesota), TestAmerica (Watertown, Wisconsin), and New Age/Landmark Mobile Analytical Services (New Haven, Michigan). Laboratory analytical reports for the bulk concrete samples are presented in **Appendix C.**

Analytical results for the bulk concrete samples are summarized on **Table 2** and **Figures 4 and 5**. PCBs were detected throughout the manufacturing portion of the facility. PCB concentrations in the bulk concrete samples ranged from below the detection limit to 3,310 mg/kg.

The bulk concrete sample PCB concentrations were compared against the EPA cleanup level of 1 mg/kg PCBs for bulk remediation waste in high occupancy (an average of 6.7 hours or more a week) areas. Of the 406 near-surface (0 to 1 inch deep) concrete samples collected, 294 samples exhibited PCB concentrations above 1 mg/kg PCBs. Deeper samples (1 to 3 inches deep or 2 to 4 inches deep) were collected from 177 of these locations. PCB concentrations were observed to decrease with depth at 176 of the 177 locations, with only 19 of the deeper samples exhibiting PCB concentrations above 1 mg/kg PCBs.

Two locations which exhibited PCB concentrations above 1 mg/kg PCBs at a depth of 1 to 3 inches were sampled from a depth of 3 to 6 inches. Concrete 31, located in the northwest loading area, contained 3,310 mg/kg PCBs in the 0 to 1 inch deep sample and 1,440 mg/kg in the 1 to 3 inch deep sample. No PCBs were detected in the bulk concrete sample collected at a depth of 3 to 6 inches (reporting limit of 0.1 mg/kg for each Aroclor). Concrete sample B6, located near the center of the "Heavy Assembly Materials" area, contained 7.53 mg/kg PCBs in the 0 to 1 inch deep sample and 2.49 mg/kg in the 1 to 3 inch deep sample. No PCBs were detected in the bulk concrete sample collected at a depth of 3 to 6 inches (reporting limit of 0.1 mg/kg for each Aroclor).

Bulk concrete samples were collected from 3 areas located on the outside of the facility: the loading ramp near the southwest corner; the truck ramp located on the east side; and the rail spur loading area on the north side. Four of the six samples collected from the rail spur loading area (Concrete 36, 39, 40, and 41) contained PCBs at concentrations exceeding 1 mg/kg PCBs. None of the samples collected from the other two areas contained PCBs at concentrations above 1 mg/kg PCBs.

3.0 CLEANUP PLAN

The SPX Lindberg facility is a manufacturing and office building. PCB-contaminated concrete is present throughout the manufacturing portion of the facility. Should a self-implementing cleanup be conducted, a cleanup level for bulk PCB remediation waste of ≤1 mg/kg would be required without further conditions per 40 CFR 761.61(a)(4)(i)(A). However, an alternative, risk-based cleanup level may be used, pending EPA approval, in accordance with 40 CFR 761.61(c). Based on preliminary conversations with personnel from EPA Region 5 and the Wisconsin Department of Natural Resources (WDNR), a risk-based cleanup level of ≤10 mg/kg PCBs may be an acceptable site-specific cleanup level for this facility.

A quantitative human health or environmental risk assessment has not been conducted. With the exception of the concrete pad in the rail spur loading area, the PCB contamination is located within the confines of the facility building. Vertical bulk concrete sampling results demonstrate that the PCBs have not penetrated the concrete floor to the underlying soil. Since the contaminated areas which will remain at the property following the proposed cleanup are confined within the physical enclosure of the building, no associated risks to the environment are anticipated. Access to the contaminated areas is provided by entrance doors which are currently locked. Under potential future use conditions, the anticipated use of the building is industrial. The potential occupational exposure in this scenario stems primarily from dermal contact with the contaminated floor.

The proposed site cleanup presented below includes off-site disposal, engineered controls, and a deed restriction to limit exposure. Based on its industrial use and limited accessibility, a risk-based cleanup level of ≤10 mg/kg is being requested for this facility. Approximately 20,650 square feet of concrete contains PCBs at concentrations greater than 10 mg/kg (**Figure 6**).

The following remediation methods are proposed for the facility in order to address the PCBs at concentrations greater than 10 mg/kg:

- Bulk PCB Remediation Waste removal and off-site disposal of the 700 square-foot concrete pad in the rail spur loading area.
- Continued Use Authorization, which includes cleaning per Subpart S and two coats of epoxy, for the in-place management of 12,150 square feet of PCB-contaminated, bare concrete flooring.
- Continued Use Authorization, which includes superficial cleaning and two coats of epoxy, for the in-place management of 7,000 square feet of PCB-contaminated, epoxy-coated concrete flooring.
- Cleaning per Subpart S for the in-place management of approximately 800 square-feet of PCB-contaminated concrete flooring located at 8 non-contiguous locations.

The locations within the facility proposed to be cleaned by these remediation methods are shown in **Figure 7**.

3.1 Bulk PCB Remediation Waste Removal and Disposal

A 16-foot by 43-foot concrete pad located in the in the rail spur loading area to the north the facility building was found to contain PCBs at concentrations greater than 10 mg/kg (**Figure 7; Appendix A, Photograph 1**). A bulk concrete sample collected from Concrete 36 contained 201 mg/kg PCBs in the 0 to 1 inch sample interval. In order to manage the PCBs in this area, SPX will remove the entire concrete pad in accordance with 40 CFR 761.61(a)(5)(i). The bulk PCB remediation wastes will be managed and disposed off-site according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(2).

Following removal of the concrete pad, a confirmation sample will be collected from the soil beneath the location of Concrete 36. This sample will be analyzed for PCBs by EPA Method 8082. A bulk concrete sample previously collected from Concrete 36 contained 2.29 mg/kg PCBs in the 1 to 3 inch sample interval. Bulk concrete samples collected from the other five locations in the concrete pad did not detect the presence of PCBs at a depth of 1 to 3 inches, so no additional confirmation sampling will be performed beneath the concrete pad.

3.2 Continued Use Authorization

The 40 CFR 761.30(p) *continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* authorization will be implemented for the in-place management of 19,150 square feet of PCB-contaminated concrete located within the facility. The proposed cleanup level for the work described in this section is ≤10 mg/kg PCBs.

The proposed cleanup area has been subdivided into two distinct areas with respect to the surface condition of the concrete. The first area consists of 12,150 square feet of bare concrete flooring stretching from the north end of the facility to approximately 440 feet to the south, including the loading dock located on the west side of the building (**Figure 7; Appendix A, Photographs 2 through 5 and 8**). The second area consists of a 7,000-square foot former assembly area near the southern end of the facility (**Figure 7; Appendix A, Photographs 6 and 7**). The floor in this area is covered with a white epoxy coating.

none @ present

3.2.1 PCB Source Control

The first step of implementing the 761.30(p) continued use authorization requires the removal of the source causing the release of PCBs. No PCB releases have been reported or are known to have occurred within the facility. The results of the investigation discussed above do not indicate a point source of the PCB contamination. The results of a Phase I Environmental Site Assessment (EA) performed at the facility indicated the potential historical presence of PCBs related to the former manufacture of electrical transformers at the facility. According to information presented in the EA report, dated September 23, 2009:

Recognized Env. Concern (REC)

> *The second suspect REC consists of the former manufacture of electric transformers at the Subject Property by the Hevi-Duty Company in the 1950's. Historically, manufacturers of transformers were known to employ dielectric fluids containing polychlorinated biphenyls (PCBs). This condition is characterized as a suspect REC since no direct evidence in the form of spills or releases of transformer fluids are known, nor have any indications of the use of PCB-containing fluids been directly identified at the Subject Property. However, the manufacturing of electric transformers at the Subject Property is indicated in a 1956 Sanborn map and the Hevi-Duty Company is known to have historically used PCB containing transformer fluids at other facility locations in the United States.*

Information regarding Hevi-Duty Company historical operations was obtained from the SolaHD website (http://www.solaheviduty.com). According to the company's historical summary, the combined operations of transformer and furnace manufacturing were moved

to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

3.2.2 Decontamination and Coating Methods

Prior to the initiation of cleanup activities at the facility, all moveable equipment and materials will be removed from the areas to be cleaned. The 12,150 square feet of bare, PCB-contaminated concrete floor will be cleaned in accordance with the double wash/rinse procedure described in 40 CFR 761 Subpart S. This procedure is intended for the decontamination of non-porous surfaces, but 761.30(p) requires that this method be used to prepare PCB-contaminated concrete for encapsulation. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include 1) high-pressure steam wash with concrete cleaner/degreaser, 2) potable water rinse, 3) power scrub with a cleaning/degreasing and muriatic acid etchant solution, and 4) high-pressure steam rinse.

The 7,000 square feet of epoxy-coated, PCB-contaminated concrete floors will be cleaned in a manner less stringent that the double wash/rinse procedure. The reason for this is that while bulk concrete samples collected from below the epoxy-coated surface in this area contained elevated levels of PCBs, wipe samples taken from the top of the epoxy-coated surface did not exhibit PCBs above 10 µg/100 cm^2. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include a 1) high-pressure steam wash with concrete cleaner/degreaser, 2) a light scuffing of the epoxy-coated surface with 100+ grit sandpaper, and 3) a final vacuum and rinse.

Following the surface washing activities and once the surface has been allowed to dry for a minimum of 24 hours, an epoxy encapsulant will be placed on the concrete surface according to the requirements of 40 CFR 761.30(p)(1)(iii)(A). Two coats of epoxy will be applied to the floor surface. The two coats of epoxy will consist of contrasting colors so that any wearing of the topcoat can be detected. In the area where a white epoxy coating already exists, one additional coat will be applied in a contrasting color.

Once the epoxy has dried, labels will be placed on the encapsulated floor surfaces to indicate that PCBs remain in the underlying concrete as specified under 40 CFR

761.30(p)(1)(iii)(B). The labels, described in 761.45, will be applied at the entrances, corners, and central portions of the encapsulated area.

3.2.3 Disposal

Wastes generated during the double wash/rinse procedure and encapsulation may include water mixed with detergent, water mixed with spent degreaser, used absorbent materials, and other equipment. These wastes will be managed according to applicable waste classification and disposal regulations as specified under 40 CFR 761.378(c). ok

3.3 Subpart S Cleaning

Besides the 19,150 square feet of PCB-contaminated concrete described above, there were eight non-contiguous concrete sample locations exhibiting PCB concentrations greater than 10 mg/kg (**Figure 7**). These locations include the following:

- Concrete 53 - 12.67 mg/kg PCBs at 0-1 inch, 1.06 mg/kg PCBs at 1-3 inches (Wipe B5 had 2.0 µg/100 cm^2 PCBs),
- Concrete 103 – 40.0 mg/kg PCBs at 0-1 inch, non-detect at 1-3 inches,
- Concrete 178 – 11.00 mg/kg PCBs at 0-1 inch (Wipe A7 had 4.6 µg/100 cm^2 PCBs),
- Concrete 230 – 11.50 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C3 had 5.6 µg/100 cm^2 PCBs),
- Concrete 239 – 22.0 mg/kg PCBs at 0-1 inch, (Wipe C6 was non-detect),
- Concrete 252 – 11.0 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches,
- Concrete 272 – 10.3 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C4 had 4.5 µg/100 cm^2), and
- Concrete 370 – 16.0 mg/kg PCBs at 0-1 inch.

Given the limited areal and vertical extent of PCBs in these eight locations, the Subpart S double wash/rinse procedure will be used to decontaminate the shallow concrete. A 10-foot by 10-foot (100-square foot) area surrounding each sample location will be cleaned using the method for bare floors as described in **Section 3.2.2**. Following the surface washing activities, confirmation bulk concrete samples will be collected from 0 to 1 inch in each of these areas and analyzed for PCBs by EPA Method 8082. Should the sample result indicate a PCB concentration of ≤10 mg/kg, the cleanup will be considered complete. If the sample result should indicate a PCB concentration greater than 10 mg/kg PCBs, an epoxy encapsulant will be placed on the 100 square-foot area as described in **Section 3.2.2**.

3.4 Schedule

It is anticipated that the cleanup will begin within approximately one month of EPA authorization and will take approximately one month to complete. The following is an estimated timeline to complete the site cleanup:

Item	*Date*
EPA Approval	*October 2010*
Initiate Site Cleanup	*November 2010*
Complete Site Cleanup	*December 2010*
Reporting and Deed Restriction Filing	*February 2011*

4.0 RECORDKEEPING

As requested in 40 CFR 761.61(a)(3)(i)(E), a file containing all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess the PCB contamination at the facility will be maintained at the facility and will be available for EPA inspection. The written certification, signed by a representative of SPX as both property owner and party conducting the cleanup, will be submitted as a separate document.

Because cleanup activities include the use of an encapsulant and PCB-contaminated concrete will remain at concentrations which exceed the regulatory cleanup levels, a deed restriction will be recorded within 60 days of the completion of the cleanup activities in accordance with 40 CFR 761.61(a)(8)(i). A written certification indicating that the deed restriction has been filed will be submitted to the EPA Regional Manager.

NOTE!

Long-term management of the PCB-affected concrete will be necessary. An operations and maintenance management plan will be developed to maximize employee protection. Components of the management plan will include training information for facility workers to inspect the encapsulant for wear and damage, procedures for repairing the encapsulant as needed, and a safety plan for workers in the event that they need to penetrate the encapsulant and drill into the concrete. The management plan will also include a plan for addressing the ultimate removal and disposal of PCB-contaminated concrete and soil remaining beneath the encapsulant for the point in time when the property is adapted for another use or the building demolished.

5.0 REMARKS

The recommendations contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The contract between Delta and its client, SPX Corporation, outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report were performed. This report is intended only for the use of Delta's client and anyone else specifically identified in writing as a user this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

This report was prepared by **DELTA CONSULTANTS.**

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Date: August 11, 2010

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Date: August 11, 2010